

Public Comment Tracking Form for ISWMP Public Review Draft

City and County of Honolulu 2019 Integrated Solid Waste Management Plan Update

Final: November 2019

Please note that public comment numbering begins at 719. Previous comments from Advisory Committee Members were addressed through development of the Draft ISWMP.

Comment No.	Name	Organization	Date of Comment	Topic	Sub-Topic	Comment	Response	Change to ISWMP?
719	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 7/18/19, 2019 Draft ISWMP	ISWMP Update Process	Public Engagement	Aloha Josh, Thank you so much for this detailed information regarding next steps. We have been sharing the plan widely with the public and are encouraging the public to read the plan and submit public comment. So not sure who will show up. Hoping we get a lot of public engagement. Mahalo, Natalie	Thank you - we appreciate your interest and participation!	No.
720	Nanea Lo, Master's Student at UH Manoa, Urban and Regional Planning		email dated 7/29/19, 2019 Draft ISWMP	Waste Diversion	Increase	ONE: Waste Diversion needs drastic improvement According to this draft plan, the amount of solid waste per capita has increased slightly, from 1.176 tons in 2013 to 1.178 tons per person in 2017. Only 2.7% of municipal solid waste went to reuse. There are some real obvious possibilities once you look at the fact that paper, food waste, green waste, wood, and plastic packaging comprise nearly two-thirds of the solid waste (59.1% by weight), based on Honolulu's waste composition study of the waste accepted at Waimanalo Gulch Landfill and H-POWER waste-to-energy plant <ul style="list-style-type: none"> Paper (uncoated corrugated cardboard, newspaper, paper bags, white and colored ledger paper, mixed recyclable paper, compostable paper, and other paper): 22.7 percent Food waste (vegetative and non-vegetative): 20.1 percent Green waste: 6 percent Wood (untreated wood, treated wood, and pallets): 5.9 percent Other plastic film/wrap (film packaging and products, shrink wrap, bubble wrap, garbage bags, produce bags, and re-sealable bags), 4.4 percent 	Thank you for your comment. The City has made a number of changes to the Plan as a result of input received during the public comment period and looks forward to the opportunity to continue to work with key stakeholders on innovative waste solutions as part of the SRWG.	No.
721	Nanea Lo, Master's Student at UH Manoa, Urban and Regional Planning		email dated 7/29/19, 2019 Draft ISWMP	Food Waste	Composting Drop off	TWO: The plan is not much of a plan. Source Reduction is "identified as the highest priority." But what they list as "foremost of the source reduction initiatives that the City plans to implement during the life of this ISWMP" is insufficient to say the least: <ul style="list-style-type: none"> Establish a Source Reduction Working Group (SRWG) Institute residential user fees based on the amount of service received Promote home green waste and food waste composting by reintroducing home composting workshops and increasing their frequency Increase food waste reduction education initiatives Several environmental advocates in Honolulu have pointed out that food waste is a prime area to address some major problems. And yet, all they have is "promote" composting through some workshops, giving advice over the phone, and updating their website. Let's get more pro-active. Awareness and education is not enough. One suggestion I have is to make city-run farmers markets a place to drop off food waste for composting.	Thank you for your comment and suggestion. The City will forward this idea to the SRWG for consideration.	No.

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722	Nanea Lo, Master's Student at UH Manoa, Urban and Regional Planning		email dated 7/29/19, 2019 Draft ISWMP	Recycling	On-Island Recycling Facility	TWO: The plan is not much of a plan. The plan briefly mentions that the city is putting out another bid for on-island recycling options. Ongoing Advances in Beneficial Reuse of Materials: The City released requests for proposal (RFPs) to solicit proposals for the beneficial reuse of several materials, including glass, auto shredder residue (ASR), and ash, in early to mid-2018. Both of those RFPs will be reissued in early 2019 in an attempt to solicit a greater number of eligible offers. An additional RFP for recycling and processing of white goods is planned for rerelease in early 2019. Currently, there are limited to no recycling options available for these materials on the island. Instead of putting out requests for proposals, what if the city invests funds into creating a municipal recycling facility that could, say, process glass?	Thank you for your comment. Please see the response to comment 735.	No.
723	Nanea Lo, Master's Student at UH Manoa, Urban and Regional Planning		email dated 7/29/19, 2019 Draft ISWMP	ISWMP Update Process	Public Engagement	THREE: Public participation in this process is insufficient.	Thank you for your comment. Please see the response to comment 1032.	No.
724	Alison Riggs, Public Policy & Government Relations Manager	Down to Earth	email dated 7/31/19, 2019 Draft ISWMP	Waste Diversion	Increase	Aloha, Thank you for this opportunity to testify on the City and County's draft revised Integrated Solid Waste Management Plan. Down to Earth Organic and Natural has six locations on Oahu and Maui. Since our founding in 1977 Down to Earth has supported the living of a healthy lifestyle and protection of the environment by our selling local, fresh, organic and natural food and products, and by promoting the eating of natural and organic products and the following of a plant-based vegetarian diet. We are supportive of the emphasis on waste reduction in the 2019 draft revised plan. We would like to see a greater emphasis on a significant and clear commitment to county-wide reduction along with an effort to further reduce harmful emissions from H-Power.	Thank you for your comment. The City has made a number of changes to the Plan as a result of input received during the public comment period and looks forward to the opportunity to continue to work with key stakeholders on innovative waste solutions as part of the SRWG.	No.
725	Alison Riggs, Public Policy & Government Relations Manager	Down to Earth	email dated 7/31/19, 2019 Draft ISWMP	Composting	Large-scale Facility	We would like to strongly encourage a composting component to be included in the plan. Food waste is a significant part of our current waste stream. Diverting food and green waste resources from our solid waste system is a win-win as compost is a carbon sink and a valuable soil building and planting medium. Many food packaging and single-use materials used in our Down to Earth stores are certified as compostable but without a composting facility those materials are ending up at H-Power. Our customers demand these types of products in our stores, with the understanding that they are making a positive environmental impact by using them instead of plastics. We would like to see these food service materials actually being composted as they were designed.	Thank you for your comment. Please see the response to comment 728.	Yes.

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726	Alison Riggs, Public Policy & Government Relations Manager	Down to Earth	email dated 7/31/19, 2019 Draft ISWMP	Source Reduction	BYO Take-Out Containers	<p>Down to Earth would also like to request a clear and straightforward ruling from the Department of Health in regards to customers being allowed to bring their own cups, bowls, and plates to food service establishments to avoid the use of single-use materials. This could also have a significant impact on reducing our waste stream while allowing Honolulu to move toward greater sustainability. Please continue to allow for the input of businesses when making decisions about single-use plastic reductions moving forward.</p> <p>Thank you for your efforts to include the voice of the public and our businesses in the Integrated Solid Waste Management Plan.</p>	<p>Thank you for your comment. The City supports allowing customers to bring their own reusable items in order to reduce the use of single-use items, but ultimately, the State Department of Health would need to change their policies to allow outside containers.</p>	No.
728	Katarina Ruiz		email dated 8/2/19, 2019 Draft ISWMP	Food Waste	Composting	<p>Food Waste/Composting: Currently there is no residential food waste mitigation or policy and only large businesses must divert food waste. This means massive amounts of food waste are being burned at H-POWER from small restaurants/stores/businesses and residents.</p> <p>This plan does not seek to change that reality at the scale we need to in order to mitigate the climate impacts of food waste. We have 12 years to change our emissions rate to alleviate the global climate crisis--food waste management is one of the most cited methods for doing that.</p> <p>We need either 1) municipal food waste composting or 2) financial support from the City (along with permitting support from the State DOH) to pursue localized, community composting solutions. We also need the City to expand the food waste ban (Chapter 9, Section 9-3.5 of the Revised Ordinances of Honolulu) to include residents and small businesses.</p>	<p>Thank you for your comment. At this time, the City has many urgent priorities it is funding and does not have the resources to develop and operate a food waste composting facility (either with or without a residential food waste collection program) that would meet the stringent health and environmental requirements of such a facility. Currently, the City is investigating the feasibility of co-digestion of biosolids and food waste to generate biogas at one or more of its wastewater treatment plants.</p> <p>The City also supports small-scale onsite composting or digestion of food waste and envisions that these projects would be led by private industry or non-governmental organizations. The City would be interested in exploring partnerships with such entities to advance such solutions.</p> <p>Expanding food waste bans could be considered if co-digestion or other solutions become feasible for managing large new quantities of food waste diverted from disposal. The City will continue to provide education and promote food waste reduction efforts such as the partnership with the NRDC to display food waste reduction advertisements in public venues. This will also be a good topic to discuss with the SRWG.</p>	Yes. Added co-digestion and small-scale composting/digestion as an option in Section 4.4.8 and 4.4.9, in Table 4-2 and Table 12-1.

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730	Dyson Chee		email dated, 8/13/19, 2019 Draft ISWMP	Food Waste	Composting	<p>Aloha to whom this may concern,</p> <p>My name is Dyson Chee and I am a 17 year old high schooler living in Honolulu. I am submitting testimony with serious concerns to the current ISWMP update. While I am not in complete opposition to the ISWMP updates (for example, I believe that the commitment to reduce solid waste per capita by 25% by 2030 is awesome!), there are a few things that I think we need to work together to achieve.</p> <p>1) Currently there is no residential food waste mitigation or policy and only large businesses must divert food waste. This means massive amounts of food waste are being burned at H-POWER from small restaurants/stores/businesses and residents. We need either 1) municipal food waste composting or 2) financial support from the City (along with permitting support from the State DOH) to pursue localized, community composting solutions. The City needs to expand the food waste ban to include residents and small businesses.</p>	Thank you for your comment. Please see the response to comment 728.	Yes.
731	Dyson Chee		email dated, 8/13/19, 2019 Draft ISWMP	Public Education	Coordinator Position	<p>2) If education is the City's cornerstone of waste reduction plan, there needs to be a dedicated staff person. Since the City will plan to investigate the feasibility of hiring someone, can the revenue from H-POWER energy sales be used to pay for an education specialist position? I would also suggest following Maui County's lead to provide small grants to community partners that are already doing waste reduction education on the City's behalf.</p>	Thank you for your comment. The City agrees that a dedicated public education coordinator is critical to meeting waste reduction goals and will prioritize the pursuit of funding for this position. Once in place, the public education coordinator will assess the most effective strategies for community partnership.	No.
732	Dyson Chee		email dated, 8/13/19, 2019 Draft ISWMP	County Tourist Tax	\$1	<p>3) I also ask that the plan consider a county tourist tax of \$1.00 per visitor to support holistic island waste management that can handle the massive visitor industry waste stream while prioritizing waste reduction.</p>	Thank you for your comment. The City would support this if enacted by the State, and will include it as a potential initiative for further consideration by the SRWG.	Yes. Added initiative to Table A-1 for consideration by the SRWG.
733	Dyson Chee		email dated, 8/13/19, 2019 Draft ISWMP	H-POWER	Waste Diversion	<p>4) Growing H-POWER and burning recyclables does not solve the core issue that we are generating way too much material that needs to be disposed of. If the City is indeed committed to waste reduction, the City must aggressively pursue policy that will reduce single-use and disposable items. Burning recyclables and relying on the ability to grow H-POWER does not achieve this. If the City is willing to renegotiate recycling policies to allow for burning, can the City instead direct that energy to working on source reduction policies (like single-use water bottle reduction or creating a safe environment for consumers to reuse containers at eateries)? As a youth, I am extremely concerned about creating another problem for my generation to solve, and I believe that diverting more resources to H-POWER will negatively impact our reducing, reusing, and recycling capabilities and dedication.</p>	Thank you for your comment. The City is committed both to further waste reduction and responsible management of residuals at H-POWER to minimize what is sent to landfill.	No.

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734	Dyson Chee		email dated, 8/13/19, 2019 Draft ISWMP	Beneficial Reuse of Ash	Health and Safety	5) Before committing to the "beneficial reuse of ash" demonstrate that this material safe to use (i.e. what happens to the heavy metals, dioxins, PCBs that infuse the ash?). I have visited H-POWER before, and was told by a worker there that it is unknown exactly what is in the ash, but that it most likely contains hazardous materials due to what is being incinerated.	Thank you for your comment. Ash from all three H-POWER units is tested quarterly in accordance with the Hawaii Department of Health's Solid Waste Management requirements to confirm dioxin, furan, arsenic, barium, cadmium, chromium, lead, selenium, silver, and hexavalent chromium levels are below the hazardous waste thresholds. Results have confirmed that the ash can be managed as a non-hazardous waste. Ash would be transported for beneficial reuse following testing.	No. The City can respond to any concerns expressed outside the plan.
735	Dyson Chee		email dated, 8/13/19, 2019 Draft ISWMP	Glass	Local Options	6) Consider local glass reuse and washing along with the more intensive glass crushing.	Thank you for your comment. The City has investigated the feasibility of an on-island glass washing and rebottling or recycling plant, but found costs to be prohibitive. The City recognizes the importance of finding an alternative to glass disposal and has committed to working with DOH on a solution in addition to releasing an RFP regarding beneficial reuse of glass.	No.
736	Dyson Chee		email dated, 8/13/19, 2019 Draft ISWMP	Source Reduction	BYO Take-Out Containers	7) If the City is committed to waste reduction, collaboration with the Department of Health to modernize the BYO container policy will be necessary. Since the City and County has stated willingness in the plan to pursue reform of other state policy, I suggest the City work on this issue directly.	Thank you for your comment. Please see the response to comment 726.	No.
737	Dyson Chee		email dated, 8/13/19, 2019 Draft ISWMP	Zero Waste Plan	Development	8) Is it possible to create a Zero Waste Plan that the City will commit to follow? For example, create a committee with experts, students, professionals, and community members having seats.	Thank you for your comment. This Plan has been prepared in response to state requirements to prepare an integrated solid waste management plan. The City will consider preparing a Zero Waste Plan at some point in the future.	No.
738	Dr. Gwen Williams		email dated 8/13/19, 2019 Draft ISWMP	Recycling	Make Mandatory	To Whom it May Concern, I live in a condo complex that does not choose to recycle and this disturbs me greatly. I used to have recycling places in the community wherein I could bring my recycled mixed use products. That program was disbanded, to my chagrin. Currently, I have to throw everything except the 5 Cent recyclables. I would like the State to legislate that all Town Houses and Condo Associations be mandated to recycle. Do not leave it up to individual associations to put together a recycling plan with private recyclers. With only 160,000 single homes having curbside recycling, there are obviously far too many who are not being required to recycle.	Thank you for your comment. A Universal Recycling and Composting Ordinance requiring recycling services to be provided to all residents and businesses has been identified for consideration by the SRWG.	No.
739	Dr. Gwen Williams		email dated 8/13/19, 2019 Draft ISWMP	Glass	Paving	Require the State to utilize glass in all paved roads.	Thank you for your comment. Please see the response to comment 735.	No.

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740	Dr. Gwen Williams		email dated 8/13/19, 2019 Draft ISWMP	Source Reduction	Extended Producer Responsibility	Require all stores selling goods take more responsibility for the goods that they sell (Extended Producer Responsibility) either by charging their bottom line or requiring their own responsibility to take back and recycle their own containers. Require that containers other than plastic be employed (i.e. vegetable-based bio products).	Thank you for your comment. Extended producer responsibility has been identified as a key initiative for further study by the SRWG given that implementation would require legislative changes.	No.
741	Marcela Montalto		email dated 8/15/19, 2019 Draft ISWMP	Waste Diversion	Increase	Aloha, I have been living in Hawaii since 2004 and in this planet since 1973. I believe it is time we take our planet seriously and start making changes to make sure future generations enjoy the same luxuries we've had thanks to nature. It is time to start reducing significantly the amount of waste we produce. It is time to educate the community to be mindful about the amount of waste we are generating every day and we can do to reduce it. It is time to reduce the amount of waste that is being burnt and that it is toxic to us. It is time composting becomes a collaborative effort of the entire island where the government works to provide the community effective resources to and training to compost. Why aren't we recycling more? I don't see trash bins that separate waste in different categories anywhere in this island. Let's bring experts in effective waste management to help us work on all the above in a way we start seeing results. I support the idea of taxing visitors \$1 to help handle the waste they produce when they come to Hawaii. We need a comprehensive plan that involves everyone with clear deadlines to accomplish goals that we can measure.	Thank you for your comment. The City has made a number of changes to the Plan as a result of input received during the public comment period and looks forward to the opportunity to continue to work with key stakeholders on innovative waste solutions as part of the SRWG.	No.
742	Alyssa Castaneda-Padilla		email dated 8/15/19, 2019 Draft ISWMP	Composting	Schools	Hello, Here's a couple ideas I think we could do to help with the 2019 Integrated Honolulu Solid Waste Management Plan (ISWMP) Plan. I think if all schools had mandatory composting this would help tremendously! I worked in an elementary school where I watched kids throw out full plate lunches and some of them were not even touched. The majority of these meals could easily be composted instead of thrown away.	Thank you for your comment. Please see the response to comment 728.	Yes.
743	Alyssa Castaneda-Padilla		email dated 8/15/19, 2019 Draft ISWMP	Composting	Community Drop-Off	Another thing I'm not sure if this already exists or not but if there were compost drop off locations and more people were informed on the process they may be more willing to participate.	Thank you for your comment.	No.
744	Alyssa Castaneda-Padilla		email dated 8/15/19, 2019 Draft ISWMP	Recycling	Make Mandatory	Lastly, make recycling mandatory! I previously lived on two separate bases, here on Oahu, where it was required. We then bought a house in Kapolei and for as much HOA as we pay here there is no help with recycling at all. We have to take our recycled items to Ewa if we choose to do so. If there was even an optional pickup and not necessarily mandatory, I'm sure many more people would participate than they do now. Thank you for helping to make improvements!	Thank you for your comment. Please see the response to comment 738.	No.

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745	Kelly Darling		email dated 8/16/19, 2019 Draft ISWMP	County Tourist Tax	\$2	Regarding ISWMP my comments are as follows: 1. Please charge all visitors a \$2 fee that goes directly towards waste reduction programs	Thank you for your comment. Please see the response to comment 732.	Yes.
746	Kelly Darling		email dated 8/16/19, 2019 Draft ISWMP	Composting	Create Program	Create island wide composting programs on all islands. Please, evaluate the efficacy of Earth Tub technology	Thank you for your comment. While there are many similar technologies, the Earth Tub was discontinued in 2018.	No.
747	Kelly Darling		email dated 8/16/19, 2019 Draft ISWMP	Public Education	Coordinator Position	3. Hire a full time Waste Reduction Education Specialist whose focus is waste reduction and community education on how to reduce waste	Thank you for your comment. Please see the response to comment 731.	No.
748	Kelly Darling		email dated 8/16/19, 2019 Draft ISWMP	Source Reduction	Single Use Plastics	4. Commit to advocating for legally imposed reductions of single use plastics	Thank you for your comment. The City supports the reduction of single-use items, but any additional taxes would need to be enacted into law by the State Legislature.	No.
749	Kelly Darling		email dated 8/16/19, 2019 Draft ISWMP	Glass	Local Options	5. Evaluate the feasibility of on island glass sanitation and rebottling	Thank you for your comment. Please see the response to comment 735.	No.
750	Raechel Kadler		email dated 8/18/19, 2019 Draft ISWMP	Food Waste	Backyard Composting	Aloha, Here are my comments on the Integrated Solid Waste Management Plan (ISWMP) update. I grew up in North Vancouver, BC, Canada and believe that you should consider implementing some programs that reflect their approach to waste management. For example, with regards to composting, each household can purchase a backyard composter at half the retail price, while the other half is subsidized. This means people are keeping their own food waste and productively turning it into soil for their gardens. (https://vancouver.ca/home-property-development/garden-composters.aspx). If implemented here, it would encourage people to take responsibility of their own food waste and minimizes the amount of residential food waste that goes to the H-POWER.	Thank you for your comment. Please see the response to comment 889.	No.
751	Raechel Kadler		email dated 8/18/19, 2019 Draft ISWMP	Food Waste	Central Facility	Additionally, Vancouver has a Green Bin Program, in which food scraps, bones, and even pizza boxes are all put into a separate bin and picked up by the city on a weekly basis to be brought to a central composting facility. (https://vancouver.ca/home-property-development/what-food-scraps-and-yard-waste-go-in-green-bins.aspx)	Thank you for your comment. Please see the response to comment 728.	No.
752	Raechel Kadler		email dated 8/18/19, 2019 Draft ISWMP	Food Waste	Residential Policy	The update lacks a residential food waste policy, and this topic should be reviewed and amended to include the necessity for composting. Some additional research in what other cities approaches are for handling food waste could be a good guide in how we handle ours. We could create local food waste composting, with which the soil created could go towards local community gardens etc. To do so, we would need more financial support from C&C. The plan as is does not include the many residents and small businesses of Honolulu, which are also producing large quantities of food waste to H-POWER. Not only could reducing the amount of food being burned decrease our overall emissions, it could also act as a carbon sink.	Thank you for your comment. Please see the response to comment 728.	Yes.

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754	Raechel Kadler		email dated 8/18/19, 2019 Draft ISWMP	Source Reduction	BYO Take-Out Containers	In addition to taxing companies to reduce their single-use item purchasing, we should encourage and reward companies that allow BYO containers. Reducing waste overall is very important, and as an eco-company, our main focus has been replacing plastic single-use items with reusable long-lasting ones. Allowing these items in restaurants/coffee shops etc is key in reducing the overall waste being produced. The DOH needs to update their policies to allow customers to use their own containers wherever possible.	Thank you for your comment. Please see the response to comment 726.	No.
755	Ida Bluhm		email dated 8/16/19, 2019 Draft ISWMP	Recycling	Residential Collection	<p>Aloha,</p> <p>My name is Ida Kawaiiani Bluhm. I was born and raised in Kahuku, but have been living off island for the last 7 years. We recently lived in Germany for the last 3 years (my husband is an active duty infantryman in the Army).</p> <p>With that being said - we picked up a lot of recycling habits from living in Germany. When we moved back to Hawaii this past June - it made me sick to my stomach and sad how little Hawaii recycles and how people just aren't educated about recycling. I hope some of these ideas are considered - because they're good! Lol. Germany is such a clean and beautiful country - and everyone who lives there really cares a lot about the environment and recycling.. it's even against the law to leave your car running if you aren't driving!</p> <p>Here we go:</p> <p>1. Everyone in Hawaii needs to be considered for recycling trash cans. Currently I live in Kahuku - and our street does not receive recycling trash cans. It's hard for people to recycle- and to not have recycling trash cans make 10x more difficult and less likely for people to recycle.</p>	Thank you for your comment. The Plan includes an initiative to expand curbside collection service to manual collection areas.	No.
756	Ida Bluhm		email dated 8/16/19, 2019 Draft ISWMP	Recycling	Residential Collection	2. In Germany - each house hold is given specific sized trash cans based on the amount of people living in your house. We are a family of 4. Our gray trash can (for miscellaneous trash) could fit 3 full trash bags in it. The garbage truck came and picked up that trash can 1x every 2 weeks. If you are recycling all your trash correctly - you shouldn't have much in your trash bin (is the idea). They didn't allow you to stuff bags in either - if your cover couldn't close- they wouldn't take the trash!	Thank you for your comment. The City agrees that proper sorting is essential, and performs inspections of carts and issues reminders or error notices if contamination is found. Requests for additional gray carts are denied if the existing gray carts are found to contain recyclables.	No.
757	Ida Bluhm		email dated 8/16/19, 2019 Draft ISWMP	Recycling	Residential Collection	3. In Germany- they gave you a Blue Bin- like Hawaii - for cardboard and paper. That trash can was big - and one size for all because a lot of things we buy come in cardboard packaging - especially if you order things on amazon.	Thank you for your comment. The City appreciates your input regarding successful curbside collection.	No.
758	Ida Bluhm		email dated 8/16/19, 2019 Draft ISWMP	Food Waste	Residential Collection	4. In Germany - they gave a green trash can for Biodegradable's (foliage and compostable foods). In the German grocery stores you can buy Biodegradable plastic-like bags to throw your compostable foods in. This way - you can line a small garbage can (to put under your sink) with the biodegradable plastic-like bag and dump your compostable foods in. This way it's easier to sort your compostables and you can tie it up and throw it in the green trash can - and the bag helps to prevent a messy trashcan. This trashcan was also picked up 1x every 2 weeks.	Thank you for your comment. Please see the response to comment 728.	Yes.

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759	Ida Bluhm		email dated 8/16/19, 2019 Draft ISWMP	Recycling	Residential Collection	5. In Germany - the "city and county" gives each house hold yellow see through plastic bags to put plastic recycling products in. These bags aren't put into a trash can. When it is plastic recycling pick up day - you put the bags out so the garbage men can see what's in the bag. If they see non plastic recyclables- they will not take the bags.	Thank you for your comment. The City appreciates your input regarding successful curbside collection.	No.
760	Ida Bluhm		email dated 8/16/19, 2019 Draft ISWMP	Recycling	Community Bins	6. In Germany - There are glass recycling bins in every community - instead of glass pick up. White, Green, and Brown glass are separated and recycled.	Thank you for your comment. The Plan includes initiatives to increase the number of recycling containers in public locations, identify City- and State-owned parcels on which to locate additional HI-5 program redemption centers, and work with DOH to find a solution for non-deposit glass recycling. The City appreciates your input regarding successful implementation of glass recycling programs.	No.
761	Ida Bluhm		email dated 8/16/19, 2019 Draft ISWMP	Glass	Local Options	7. In Germany - all beer bottles are recycled! I would say about 98% of beer comes in glass bottles. When you buy a case of beer you pay a bottle deposit. Depending on the beer company - the deposit changes. For Belgium beer - the deposit was usually more. The deposit was also not something small like 10 cents. It was \$3-\$4 per case (German Cases consist of 12 bottles or more). But that is a lot of extra money to not be getting back.. especially if you drink beer weekly. The bottles are dropped off at the grocery store or at a bottle recycling center. You drop of your case and you get your deposit back. They then re-use the bottles. They just sanitize all bottles and re bottle them with beer. If we could get local Hawaiian Beer companies like Kona Brewing.. etc. .. to do that - maybe more people would buy local beer..? Also the beer bottles come in a plastic case - like how soda bottles were sold in the olden days. The plastic case allows you to put the beer bottle in when you are done drinking a beer. Then you can easily take the case back.	Thank you for your comment. The City will forward these excellent suggestions to the SRWG for consideration; perhaps this would be something the SRWG could take on and reach out to local brewers. Increasing the deposit fee would of course be a state issue.	No.
762	Ida Bluhm		email dated 8/16/19, 2019 Draft ISWMP	Recycling	Community Bins	8. There are recycling bins (trash, plastic, paper) everywhere in public. I barely saw just a regular single trash can in the entire country. I hope some of these ideas are considered! Local people just need to be educated about recycling. Not only the importance of recycling, but HOW to recycle. Many don't do it - because they don't know how. Laws need to be made stricter. I know it's a process, but I also know it can be done! Mahalo for your hard work and time!	Thank you for your comment. Please see the response to comment 760.	No.

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Comment No.	Name	Organization	Date of Comment	Topic	Sub-Topic	Comment	Response	Change to ISWMP?
764	Taylor Eastburn	Patagonia Honolulu EPP	email dated 8/19/19, 2019 Draft ISWMP	Food Waste	Composting	<p>Please do more to promote and increase the use of composting throughout Hawaii. There are some options available for commercial operations, but nothing for residential? We're missing out on a resource that would improve soil health, as well as help combat climate change.</p> <p>- Food Waste/Composting: Currently there is no residential food waste mitigation or policy and only large businesses must divert food waste from H-POWER in Honolulu. This means massive amounts of food waste are being burned at H-POWER from small restaurants/stores/businesses and residents. This plan does not seek to change that. We have 12 years to change our GHG emissions rate to alleviate the global climate crisis--food waste management is one of the most cited and effective methods for doing that.</p> <p>- We need: 1) municipal food waste composting, or 2) financial support from C&C (along with permitting support from the State DOH) to pursue localized, community composting solutions, and 3) The City to expand the food waste ban (Chapter 9, Section 9-3.5 of the Revised Ordinances of Honolulu) to include residents and small businesses.</p> <p>Thank you for taking the time to read my testimony. Please re-think the current waste management plan, I know we can do better.</p>	Thank you for your comment. Please see the response to comment 728.	Yes.
765	Delphine Homerowski		email dated 8/19/19, 2019 Draft ISWMP	Source Reduction	Commercial and Industrial Facilities	<p>Chapter 3, Section 4 – Strategies for Additional Source Reduction</p> <p>The plan provides suggestions for individuals and homeowners actions for waste reduction but falls short of suggestions for education and workshops for commercial and industrial facilities and operators (i.e. hotels, restaurants, office spaces etc.) Training, resources and incentives must be provided to such facilities in addition to local resident's involvements as they are large contributors to the waste problem.</p>	Thank you for your comment. The City is working to hire a Public Education Coordinator to expand current educational offerings. Additional source reduction initiatives affecting commercial and industrial facilities have been identified for further consideration by the SRWG.	No.
766	Delphine Homerowski		email dated 8/19/19, 2019 Draft ISWMP	Source Reduction	Commercial Waste Reduction Incentives	In addition, the county needs to implement policies and incentives for businesses to implement waste reduction practices. Examples of such practices include, the sales of bulk items in groceries stores and farmers market, discontinue the sale to single use plastic bottles and support larger containers sale.	Thank you for your comment. These initiatives have been identified for further consideration by the SRWG.	No.
767	Delphine Homerowski		email dated 8/19/19, 2019 Draft ISWMP	Source Reduction	Single Use Plastics	<p>3.4.9 Plastic Bag Ban</p> <p>Ban on plastic bags, plastic take-out containers, and other single-use plastic items need to be firmly implemented by the City and County of Honolulu, following other counties in the state such as Kaua'i County. Pushing back on implementation dates, and authorizing exceptions continues to contribute to the waste management issue in the county.</p>	Thank you for your comment. Please note that the goal is a 1% reduction in the total waste stream, 10% of which is currently plastic waste. So this goal equates to a 10% reduction in the overall amount of plastic waste going to H-POWER and the landfill. While the City is comfortable with the current plastics reduction goal, we will not stop there and hope that the strategies identified through this Plan and future discussion with the SRWG will result in reductions in exceedance of the goal.	No.

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768	Delphine Homerowski		email dated 8/19/19, 2019 Draft ISWMP	Recycling	Sorting	Chapter 4 – Recycling and Bioconversion The current recycling market is very inefficient in addressing the large amount of waste and recyclable being produced, as less than 9-10% of recyclables are ever recycled. A large contributor to such limitations is the fact that recyclables are often not sorted or cleaned properly. Such issue must be addressed through education, but also by providing better sorting options for consumers, individuals and homeowners. Having one recyclables collection cart is not sufficient to guarantee effective sorting, as most items will end up being contaminated. Following models from countries that have more successful programs, the county of Honolulu should be considering adding separate collection carts for paper and glass for instance.	Thank you for your comment. Please see the response to comment 946.	No.
769	Delphine Homerowski		email dated 8/19/19, 2019 Draft ISWMP	Recycling	Community Bins	4.3.3. – Public Recycling Receptacles Increasing the number of public receptacles can help addressing the lack of accessible deposit points for HI-5 recyclables. In addition, such receptacles should be added for other items such as AA-batteries, light bulbs and larger e-waste such as phones, computers, printers, etc. Often, such items will end up in the waste stream as residents do not know how or where to dispose of them properly.	Thank you for your comment. The Plan includes initiatives to increase the number of recycling containers in public locations, identify City- and State-owned parcels on which to locate additional HI-5 program redemption centers, and urge the state legislature to develop a state-wide solution and funding source to address the growing e-waste problem.	No.
770	Delphine Homerowski		email dated 8/19/19, 2019 Draft ISWMP	Food Waste	Composting	In addition, I would like to concur with Zero Waste O’ahu’s comments: • Food Waste/Composting: Currently there is no residential food waste mitigation or policy and only large businesses must divert food waste from H-POWER in Honolulu. This means massive amounts of food waste are being burned at H-POWER from small restaurants/stores/businesses and residents. This plan does not seek to change that. We have 12 years to change our GHG emissions rate to alleviate the global climate crisis--food waste management is one of the most cited and effective methods for doing that. We need: 1) municipal food waste composting, or 2) financial support from C&C (along with permitting support from the State DOH) to pursue localized, community composting solutions, and 3) The City to expand the food waste ban (Chapter 9, Section 9-3.5 of the Revised Ordinances of Honolulu) to include residents and small businesses.	Thank you for your comment. Please see the response to comment 728.	Yes.
771	Delphine Homerowski		email dated 8/19/19, 2019 Draft ISWMP	Public Education	Coordinator Position	Education: If education is the cornerstone of the waste reduction plan, there needs to be a dedicated staff person. Right now the plan does not account for that and is non-committal about hiring an education specialist (stating the City will “plan to investigate the feasibility” of hiring someone). Can the revenue from H-POWER energy sales be used to pay for an education specialist position? We also suggest following Maui County’s lead to provide small grants to community partners that are already doing waste reduction education in lieu of the C&C behalf.	Thank you for your comment. Please see the response to comment 731.	No.
772	Delphine Homerowski		email dated 8/19/19, 2019 Draft ISWMP	County Tourist Tax	\$1	Tourist tax: We ask the plan consider a county tourist tax of \$1.00 per visitor to support holistic island waste management that can handle the massive impact of visitor industry waste stream on our local waste systems and to support the visitor industry in prioritizing waste reduction.	Thank you for your comment. Please see the response to comment 732.	Yes.

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773	Delphine Homerowski		email dated 8/19/19, 2019 Draft ISWMP	H-POWER	Waste Diversion	Burning Recyclables: Burning recyclables is a band-aid for the core issues that we produce too much stuff that must be throw away. This plan explores burning recyclables at H-POWER as a solution to the currently weak recycling market. If the City is committed to waste reduction, the then aggressively pursue policy that will reduce single-use items for recycling or burning. If the City is willing to renegotiate recycling state policies to allow for burning (currently the State of Hawai'i does not allow the counties to burn recyclables), can the City instead direct that energy to working on source reduction policies (like single-use water bottle reduction or creating a safe environment for consumers to reuse containers at eateries)?	Thank you for your comment. Please see the response to comment 733.	No.
774	Delphine Homerowski		email dated 8/19/19, 2019 Draft ISWMP	H-POWER	Waste Diversion	H-POWER: We do not want a fourth boiler, so let's not plan for it! Instead, let's plan to make less trash and renegotiate the H-POWER so we do not have to deliver 800,000 tons of trash each year.	Thank you for your comment. Please see the response to comment 942.	No.
775	Delphine Homerowski		email dated 8/19/19, 2019 Draft ISWMP	Beneficial Reuse of Ash	Health and Safety	H-POWER ash: before committing to the "beneficial reuse of ash" demonstrate that this material safe to use (i.e. what happens to the heavy metals, dioxins, PCBs that infuse the ash?).	Thank you for your comment. Please see the response to comment 734.	No.
776	Delphine Homerowski		email dated 8/19/19, 2019 Draft ISWMP	Glass	Local Options	Glass: Consider local glass reuse and washing along with the more intensive glass crushing.	Thank you for your comment. Please see the response to comment 735.	No.
777	Delphine Homerowski		email dated 8/19/19, 2019 Draft ISWMP	Source Reduction	BYO Take-Out Containers	BYO container & DOH: If the City is committed to waste reduction, collaboration with DOH to modernize BYO container policy will be necessary. Since the City and County has stated willingness in the plan to pursue reform of other state policy, we suggest the City work on this issue directly.	Thank you for your comment. Please see the response to comment 726.	No.
778	Delphine Homerowski		email dated 8/19/19, 2019 Draft ISWMP	Zero Waste Plan	Development	Source Reduction Working Group: can an outcome of this group be to create a Zero Waste Plan that the City will commit to follow? There needs to be student and community member seats on this committee.	Thank you for your comment. Please see the response to comment 737.	No.
779	Tenaiya Brookfield		email dated 8/20/19, 2019 Draft ISWMP	Food Waste	Expand Ban	<p>Hawaii Ohana,</p> <p>First and foremost, thank you for being open to hear our comments about the waste plan. I can't imagine how many emails you will be reading, so I'm focusing on 4 feasible solutions and not just desires.</p> <p>1. Food Waste Ban</p> <p>If the county has no budget for composting then please expand the food waste ban to include others beyond large businesses. Year 1-3 it can include large apartment buildings, year 4-7 it can include smaller buildings and smaller businesses, year 8-10 it can extend island wide. I suggest starting with large condos as they have full management teams with the man power, money and resources to follow just like large hotels. Having a meeting with 100 condo managers would have the impact of speaking to 60,000 people. That represents hundreds of thousands of pounds of trash, and food waste which can be diverted from H-power/landfill.</p> <p>I live in a condo in Kakaako and would be happy to help lead the way for my building as a pilot program.</p>	Thank you for your comment. Please see the response to comment 728.	Yes.

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780	Tenaiya Brookfield		email dated 8/20/19, 2019 Draft ISWMP	Composting	Small-Scale	<p>2. Smaller Composting Facilities</p> <p>If the county has no budget for multi million dollar island wide composting facility, please allocate funds for the smaller scale community options closer to the \$100,000 range. Here are some examples:</p> <p>Earth cube - can process 50 pounds per day, avoids smells and keeps animals out http://compostingtechnology.com/in-vessel-composting-systems/earth-cube/#1447183570683-cdddeb4d-61b8</p> <p>Earth flow vessel- can process 300 pounds to 3 tons http://compostingtechnology.com/in-vessel-composting-systems/earth-flow-custom-vessel/#1460580994335-67416e0c-6d474ef9-6f3b</p> <p>If the funds aren't available for even these smaller facilities, then propose a charge to the users to regain costs. If starting with large condos, plan to have them pay an annual fee, just as they do for the pick up of their other waste. If in smaller communities, they can pay a monthly or per visit fee. There are a lot of people who would like to compost but have no land with which to do it and need the county's help.</p>	Thank you for your comment. Please see the response to comment 728.	Yes.
781	Tenaiya Brookfield		email dated 8/20/19, 2019 Draft ISWMP	Source Reduction	Single Use Plastics	<p>3. Add Language</p> <p>To Support Legislation Change:</p> <p>Instead of saying the goal is 1% reduction in plastics, please change it to say "Our goal is a 90% reduction in plastics, however, this would only be possible with legislation to support single use plastic ban or other similar initiatives to make this possible. In the meantime, 1% is the only perceivable goal without legislative support." This language will help showcase desire and need for change, without compromising your desire for realistic goals based on current conditions.</p>	Thank you for your comment. The City supports source reduction and litter prevention, but notes that City Council would need to act to close the plastic bag ban loophole.	No.
782	Tenaiya Brookfield		email dated 8/20/19, 2019 Draft ISWMP	Source Reduction	Examples from Other Islands	<p>To show due diligence:</p> <p>Showcase why modest goals have been set. Provide examples of other island communities who have had successful zero waste plans making major improvements and why these models aren't feasible for Oahu. 4 examples: Taiwan used to be known as garbage island and is now a leader in waste management. Singapore sends only 2% of its waste to the landfill. Sardinia went from the worst island in the Mediterranean to the best in terms of waste reduction in just 10 years. Bali has banned single use plastics.</p>	Thank you for your comment.	No.

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783	Tenaiya Brookfield		email dated 8/20/19, 2019 Draft ISWMP	County Tourist Tax	\$1	<p>To address tourism:</p> <p>Do the 6 million tourists who come to Oahu per year pay their fair share to manage and even offset the trash they produce? It is in the county's interest to keep Oahu beautiful but funding seems to be a reoccurring issue. The environmental and financial burden shouldn't fall on the 1 million residents alone. This language added might help set the stage for additional taxation of tourists. Even \$1 per tourist would provide enough funding for some of the programs that are in desperate need.</p>	Thank you for your comment. Please see the response to comment 732.	Yes.
784	Tenaiya Brookfield		email dated 8/20/19, 2019 Draft ISWMP	Public Education	Coordinator Position	<p>4. Education</p> <p>If the funds aren't available for a full time educator, then establish KPIs in the plan for the person(s) who handle the website, current marketing spend, social media accounts, and current outreach programs like tour de trash. If there are funds to print flyers for the community meeting, then there are funds for advertising online even if its just \$300 a month on an instagram account. Advertising online will give you clicks/views/etc data to see if there is a return on investment instead of just hoping for an effect. Instead of offering 2 public trips per year to see h-power/landfill/recycling center, make it once per month.</p>	Thank you for your comment. The City will take this into consideration moving forward. Reach and effectiveness of the City's current public education efforts will be evaluated as part of the Public Education Plan development process. The final Public Education Plan will include a comprehensive set of strategies determined to most effectively utilize the City's resources to achieve the greatest results.	No.
785	Culver Alan Rausch Jr		email dated 8/20/19, 2019 Draft ISWMP	Illegal Dumping	Reduce	<p>Being of Hawaiian decent,</p> <p>It hurts and disappoints me to know my family's memories of Oahu has been tarnished by not only mosquitos and air pollution, but by sun tan lotion and litter. It makes me sad to see these videos of the honu (sea turtles) with straws in their mouth and nose dying and taking with them the magic of Hawai'i.</p> <p>I am moving back to Oahu, my family's home, with the soul purpose of looking for ways to educate the children, protect the land and its people, and help pick up trash and discourage tourists from doing further damage with neglect and apathy in their hearts.</p> <p>The laws, systems, and processes in control of the waste and contamination MUST GET CURRENT. They must get relevant or it is already too late. Please change the plans before time runs out for the beautiful islands so important to the overall security and culture of America. Clean this land, and keep these islands clean!</p>	Thank you for your comment. The City has made a number of changes to the Plan as a result of input received during the public comment period and looks forward to the opportunity to continue to work with key stakeholders on innovative waste solutions as part of the SRWG.	No.

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786	Joy Bitonio		email dated 8/20/19, 2019 Draft ISWMP	Public Education	Increase Efforts	<p>Aloha,</p> <p>I appreciate the commitment to reducing solid waste per capris by 25%. However, the plan does not seem strong enough to offer actionable and measurable ways to reduce waste. This plan truly requires a full time Education Specialist to focus on waste reduction.</p> <p>Here are some of my thoughts on the issue:</p> <p>Educating the public in ways that “speak” to each demographics language via the appropriate media (ie: radio, TV, social media) is necessary to help create awareness on the issue and the resources available for the public to contribute to the reduction of waste that enters the waste system and instead work towards a lifestyle that embraces a circular economy. As a resident that cares about a lifestyle that minimizes impact on the ‘aina, even I have trouble finding info on resources & alternatives where I can take care of waste properly. Get out and attend/provide education at high waste output venues like block parties (Night Market, etc) to help educate vendors and customers, have separate bins accessible, partner with groups like Sustainable Coastlines to help with creating bins and offering refillable water stations.</p> <p>Educate the public about what can and can’t be recycled and spread awareness that if incorrect items are placed in bins often nothing in these bins get recycled due to incorrect items (or incorrectly prepared, ie: clean plastic bottles with lids off) in bins. Yet, continue to reinforce emphasis that the best way to solve the issues is reusables, preventing waste from entering the landfill, etc.</p> <p>While recycling has its place in contributing to diverting waste, it is NOT the answer. I think this can be a simple yet effective educational component.</p>	Thank you for your comment. The City plans to prioritize hiring a dedicated public education coordinator and develop a Public Education Plan to address gaps in the current public education program.	No.
787	Joy Bitonio		email dated 8/20/19, 2019 Draft ISWMP	Recycling	Facilitation	<p>Further, creating accessibility and ease to things such as backyard composting education, sorted bins in public places (trash, recycle, compost) can empower people to help sort waste accordingly. Make it easy for businesses to recycle and compost. Without incentive they just do what is the path of least resistance when it comes to effort and money spent. I work at a retail shopping center property that stopped recycling cardboard boxes because it was cheaper to throw them in the trash. Unfortunate, right?</p>	Thank you for your comment. The Plan includes a number of initiatives aimed at increasing public education, expanding recycling pickup, and increasing availability of public recycling containers.	No.
788	Joy Bitonio		email dated 8/20/19, 2019 Draft ISWMP	Source Reduction	Restaurants and Businesses	<p>Public composting is a great solution to diverting waste from landfills. This should be included in the plan in an actionable and measurable way to demonstrate the benefits of these efforts. I see several small businesses trying to do the right thing, for example eateries that are registered Ocean Friendly Restaurants via Surfrider. These restaurants commit to meeting a minimum of 5 initiatives such as no plastic straws, no plastic bags, no styrofoam, and offering “for here” reusables when eating in.</p>	Thank you for your comment. Several source reduction incentive initiatives have been identified for further consideration by the SRWG.	No.

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789	Joy Bitonio		email dated 8/20/19, 2019 Draft ISWMP	Composting	Single Use Items	The majority of compostable single use items that are often purchased are not backyard compostable and require an industrial compost facility in order for them to compost. Can the city look into adding a compost facility for these types of items and incentives for selecting compostables over the cheaper but environmentally destructive styrofoam & plastic containers widely used?	Thank you for your comment. Please see the responses to comments 728 and 986.	Yes.
790	Joy Bitonio		email dated 8/20/19, 2019 Draft ISWMP	Source Reduction	Single Use Plastics	While I commend the plastic bag ban the loophole created by using the thickness of a bag as the determinant of reusable vs. single use only made some larger companies respond by creating thicker plastic bags (which is worse since these thicker bags will last even longer in our waste systems or in the ocean if it makes its way to sea). For example, Safeway and Longs Drugs offer these thick plastic bags, most of which I am sure find their way into the trash.	Thank you for your comment. Please see the response to comment 781.	No.
791	Joy Bitonio		email dated 8/20/19, 2019 Draft ISWMP	Source Reduction	Restaurants and Businesses	Encouraging reusables and incentivizing businesses and shoppers to bring and use them when dining out is another great and easy to implement practice for businesses. Perhaps there is a way to offer monetary incentives to businesses that reduce their waste by "X" % via initiatives such as these.	Thank you for your comment. The City has included this strategy in the list of initiatives for further consideration by the SRWG.	No.
792	Joy Bitonio		email dated 8/20/19, 2019 Draft ISWMP	County Tourist Tax	\$1	With over 9.9 million tourists in 2018 and growing, the island has limited resources and infrastructure in place to address the added waste this creates on top of what residents already do. I believe imposing a nominal fee (ie: \$1) to each visitor to subsidize the burden of visitor trash and include reduction of waste, including visitor education on ways they can reduce their contribution to the waste issue.	Thank you for your comment. Please see the response to comment 732.	Yes.
794	Audrey Stanley		email dated 8/20/19, 2019 Draft ISWMP	Food Waste	Expand Ban	2. Food Waste Ban If the county has no budget for composting then please expand the food waste ban to include others beyond large businesses. Year 1-3 it can include large apartment buildings, year 4-7 it can include smaller buildings and smaller businesses, year 8-10 it can extend island wide. I suggest starting with large condos as they have full management teams with the man power, money and resources to follow just like large hotels. Having a meeting with 100 condo managers would have the impact of speaking to 60,000 people. That represents hundreds of thousands of pounds of trash, and food waste which can be diverted from H-power/landfill.	Thank you for your comment. Please see the response to comment 728.	Yes.

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795	Audrey Stanley		email dated 8/20/19, 2019 Draft ISWMP	Composting	Small-Scale	<p>3. Smaller Composting Facilities</p> <p>If the county has no budget for multi million dollar island wide composting facility, please allocate funds for the smaller scale community options closer to the \$100,000 range. Here are some examples:</p> <p>Earth cube - can process 50 pounds per day, avoids smells and keeps animals out http://compostingtechnology.com/in-vessel-composting-systems/earth-cube/#1447183570683-cdddeb4d-61b8</p> <p>Earth flow vessel- can process 300 pounds to 3 tons http://compostingtechnology.com/in-vessel-composting-systems/earth-flow-custom-vessel/#1460580994335-67416e0c-6d474ef9-6f3b</p> <p>If the funds aren't available for even these smaller facilities, then propose a charge to the users to regain costs. If starting with large condos, plan to have them pay an annual fee, just as they do for the pick up of their other waste. If in smaller communities, they can pay a monthly or per visit fee. There are a lot of people who would like to compost but have no land with which to do it and need the county's help.</p>	Thank you for your comment. Please see the response to comment 728.	Yes.
796	Audrey Stanley		email dated 8/20/19, 2019 Draft ISWMP	County Tourist Tax	\$1	<p>4. To address tourism:</p> <p>Do the 6 million tourists who come to Oahu per year pay their fair share to manage and even offset the trash they produce? It is in the county's interest to keep Oahu beautiful but funding seems to be a recurring issue. The environmental and financial burden shouldn't fall on the 1 million residents alone. Even \$1 per tourist would provide enough funding for some of the programs that are in desperate need.</p>	Thank you for your comment. Please see the response to comment 732.	Yes.
798	Casey Nakamura		email dated 8/21/19, 2019 Draft ISWMP	Composting	Large-Scale Facility	<p>My top concern however is the lack of composting facilities here in Hawai'i. In Section 4, I would like to see large-scale local means of composting provided for the community. This includes but is not limited to food waste as well bioplastics. Composting is not only an amazing solution to reducing waste, but it is a solution that also helps to regenerate the land and cycle healthy resources back into it. Businesses and individuals have made great strides to provide/use compostable goods (ie. cups, take out containers, straws, etc), and yet we have no local facilities to actually compost them at. The average person does not have the means to compost materials like plastic. In order to do so, these items would have to be shipped out of state to the nearest facilities (a huge feat as we are the most isolated state). This is completely impractical and adds to the amount of waste produced as well as the carbon footprint it leaves behind.</p>	Thank you for your comment. Please see the response to comment 728.	Yes.
799	Casey Nakamura		email dated 8/21/19, 2019 Draft ISWMP	Source Reduction	Local Options	<p>The State of Hawai'i is lacking in much self-sufficiency. Not only do we import majority of our goods (ie. 90% of our food) but export a huge amount of our problems (ie. waste and recyclables). We must start becoming more self-sufficient in combating our own waste problems, not by expanding landfills but by creating solutions that reduce the inevitable waste altogether.</p>	Thank you for your comment. The City will take it into consideration when assessing source reduction strategies moving forward.	No.

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Comment No.	Name	Organization	Date of Comment	Topic	Sub-Topic	Comment	Response	Change to ISWMP?
800	Kimeona Kane, Director of Community Outreach	808 Cleanups	email dated 8/26/19, 2019 Draft ISWMP	Public Education	Increase Engagement	<p>Aloha,</p> <p>First off, Mahalo for putting together the Integrated Solid Waste Management 2019 Draft Plan and taking feedback from the public.</p> <p>I wanted to share the following comments, concerns, questions with you folks in regards to the plan and materials provided.</p> <p>I can appreciate the education that has been provided to the public and noted the 18 educational presentations done in 2017 reaching approximately 850 people. I do believe this needs to increase tremendously and quickly seeing that our 2017 census listed 988,650 people in the county of Honolulu alone, this translates to a reach of .00085%. What are the goals of reach and education moving forward? I liked that the draft mentions increased outreach in 2018, however I feel it is still at a concerning low. I suggest that information be shared via platforms like the Neighborhood Boards and possibly having a representative available to participate and engage with the community regularly. In 2017, a total of 23 tours (including Tour de Trash and private tours) were conducted, with an estimated attendance of 550 people, again using the population of 988,650, this results in a .00055% reach. 23 tours in a year? I feel like engaging the public and offering tours weekly will help the reach. There are opportunities to take some of this learning to schools, encouraging better composting, recycling, etc. and I am sure there are many complexities not illustrated behind moving that forward, however, I feel it should be looked into deeper.</p>	Thank you for your comment. The City agrees that the tours are important and is committed to increasing the number of tours each year to the extent allowed by our operating budget. The City hopes that in educating children and those interested in tours, the lessons taught and learned will reach further via word of mouth.	No.
801	Kimeona Kane, Director of Community Outreach	808 Cleanups	email dated 8/26/19, 2019 Draft ISWMP	Marine Debris	Community Bins	<p>With the continued influx of marine debris and marine plastics, I find it very concerning that the City/State does not have an active management plan listed in this draft to address it. Though I do understand it may not be considered "household" trash, I do strongly believe that the impacts are felt across the island, primarily on the windward shores. As more people build awareness to global issues and the impacts felt here in Hawaii, this topic and the waste collected needs to be included in the management plan in some capacity. I strongly believe that a bin should be provided, managed and designated at all windward sites, including Waimanalo and Laie Convenience and Kapaa Transfer, with room to expand should there be an influx impacting our south and west shores as well. The City should anticipate, encourage and support community involvement in such things like community lead clean ups etc. and make it easier for communities to dispose of these materials.</p>	Thank you for your comment. The City is aware of the disposal challenges faced by community cleanup organizations and has committed to investigating the feasibility of allowing those organizations to bring collected materials to convenience centers and transfer stations following cleanup events.	No.

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Comment No.	Name	Organization	Date of Comment	Topic	Sub-Topic	Comment	Response	Change to ISWMP?
802	Kimeona Kane, Director of Community Outreach	808 Cleanups	email dated 8/26/19, 2019 Draft ISWMP	Convenience Centers	Improve Operations	Convenience centers need more attention then the plan is giving. As a resident of Waimanalo, I have seen on more occasions, center closures because the bins are full and have not been changed out, or are waiting to be changed out. This creates a very unfortunate situation, possibly resulting in people needing to go to another center and or even adding to the already uncontrollable issue of illegal dumping. I would like to see a transparent report of closures, duration of time, frequencies and action plans to assist with this. In addition, some time of public notice to inform community members about potential disruptions that may impact their decisions and or plans. I believe that at most convenience centers, there should be an excavator and operator that can facilitate the loading of the bins, ensuring that items are compacted to best maximize the bin space. I see many times the bins are at capacity, but there is so much loss and wasted space because items are not compacted. I do believe this would alleviate the need to change bins so frequently and can ensure less closures.	Thank you for your comment. The City strives to continually improve service at the convenience centers and is working to rectify the lack of staff available to change out bins.	No.
803	Kimeona Kane, Director of Community Outreach	808 Cleanups	email dated 8/26/19, 2019 Draft ISWMP	Convenience Centers and Transfer Stations	Improve Consistency	In this day and age, where trash management is being tested due to the evolution of products provided to the general public, I believe there are opportunities to build better consistencies between convenience centers and transfer stations in terms of what can be accepted. Disposing of items should not be such a hassle and certainly should not be a discouraging and even frustrating event for the public.	Thank you for your comment. The City will take this into consideration.	No.
804	Kimeona Kane, Director of Community Outreach	808 Cleanups	email dated 8/26/19, 2019 Draft ISWMP	Non-Profits	Disposal Support	Will there be further details and or specifics in regards to Non Profits provided? There are many great non profits and volunteers who are doing what they can to make an impact, keeping our islands clean, I see so much value in bridging the work and allowing these groups and events better, simpler accesses and disposal support. With so many resources being limited and underfunded or even understaffed, I cannot see why disposal support cannot be provided if there are volunteers out there willing to donate their time and energy to do the cleaning. Maybe a non profit could even assist in managing these types of things.	Thank you for your comment. Please see the response to comment 801.	No.
805	Kimeona Kane, Director of Community Outreach	808 Cleanups	email dated 8/26/19, 2019 Draft ISWMP	Invasive Species	Spread Prevention	With so much waste being moved across the island, the opportunities to spread invasive species are even greater. What has the city adopted for these vehicles, staff and even the waste itself to help preserve the integrity of our special and threatened natural environment? Are there active testers on site from the different agencies like OISC? Helping to ensure that the spread of these invasive threats are not finding new homes via the waste management process?	Thank you for your comment.	No.
806	Asia Yeary		email dated 8/26/19, 2019 Draft ISWMP	Zero Waste Plan	Development	Dear C&C of Honolulu Department of Environmental Services, Thank you for the opportunity to submit comments on your Integrated Solid Waste Management Plan and your commitment to reduce solid waste 25% per capita by 2030. This is a great start, but Honolulu needs to strive for Zero Waste. Before you discount this idea because it sounds too ambitious and difficult, please watch this video: https://sfenvironment.org/striving-for-zero-waste .	Thank you for your comment and the link to the video.	No.

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807	Asia Yeary		email dated 8/26/19, 2019 Draft ISWMP	Zero Waste Plan	Composting	Similar to Denmark, Honolulu incinerates. Denmark representatives came to San Francisco to learn more about Zero Waste and the benefits of composting. Today they are transitioning. Please read the Story of Denmark's transition from incineration to zero waste here: https://zerowasteurope.eu/2014/01/the-story-of-denmarks-transition-from-incineration-to-zero-waste/ . Composting is key and Honolulu needs more composting, which is a great climate change and soil health solution.	Thank you for your comment and the link to the article.	No.
808	Asia Yeary		email dated 8/26/19, 2019 Draft ISWMP	Source Reduction	SRWG	Thank you for creating the Source Reduction Working group. Please continue this group and add at least two community member seats to this group. Please ask this Source Reduction Working group to create a Zero Waste Plan which is integrated into the Honolulu ISWMP. Additionally, this group can also work with HDOH to modernize the following: <ul style="list-style-type: none"> • composting policies (HDOH does not recognize all ways that composting works and therefore does not allow certain techniques that other municipalities allow) • bring your own container policies, and • single use container policies. 	Thank you for your comment. The City supports source reduction and has included policy initiatives and zero waste concepts in the list of strategies for consideration by the SRWG.	No.
809	Asia Yeary		email dated 8/26/19, 2019 Draft ISWMP	Source Reduction	Single Use Plastics	San Francisco International Airport recently banned single use water bottles. Honolulu and Honolulu International Airport can follow suit. Please watch this video: https://www.youtube.com/watch?v=R9MGKpRa0sU	Thank you for your comment. Please see the response to comment 781.	No.
811	Asia Yeary		email dated 8/26/19, 2019 Draft ISWMP	Food Waste	Composting	Specific to the ISWMP, please consider the following: <ul style="list-style-type: none"> • Food Waste/Composting: Currently there is no residential food waste mitigation or policy and only large businesses must divert food waste from H-POWER in Honolulu. This means massive amounts of food waste are being burned at H-POWER from small restaurants/stores/businesses and residents. This plan does not seek to change that. We have 12 years to change our GHG emissions rate to alleviate the global climate crisis--food waste management is one of the most cited and effective methods for doing that. <ul style="list-style-type: none"> o We need: 1) municipal food waste composting, or 2) financial support from C&C (along with permitting support from the State DOH) to pursue localized, community composting solutions, and 3) The City to expand the food waste ban (Chapter 9, Section 9-3.5 of the Revised Ordinances of Honolulu) to include residents and small businesses. 	Thank you for your comment. Please see the response to comment 728.	Yes.
812	Asia Yeary		email dated 8/26/19, 2019 Draft ISWMP	H-POWER	Waste Diversion	Burning Recyclables: Burning recyclables is a band-aid for the core issues that we produce too much stuff that must be throw away. This plan explores burning recyclables at H-POWER as a solution to the currently weak recycling market. If the City is committed to waste reduction, then aggressively pursue policy that will reduce single-use items for recycling or burning. If the City is willing to renegotiate recycling state policies to allow for burning (currently the State of Hawai'i does not allow the counties to burn recyclables), can the City instead direct that energy to working on source reduction policies (like single-use water bottle reduction or creating a safe environment for consumers to reuse containers at eateries)?	Thank you for your comment. Please see the response to comment 733.	No.
813	Asia Yeary		email dated 8/26/19, 2019 Draft ISWMP	H-POWER	Waste Diversion	H-POWER: We do not want a fourth boiler, so let's not plan for it! Instead, let's plan to make less trash and renegotiate the H-POWER so we do not have to deliver 800,000 tons of trash each year.	Thank you for your comment. Please see the response to comment 942.	No.

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814	Asia Yeary		email dated 8/26/19, 2019 Draft ISWMP	Beneficial Reuse of Ash	Health and Safety	H-POWER ash: before committing to the "beneficial reuse of ash" demonstrate that this material safe to use (i.e. what happens to the heavy metals, dioxins, PCBs that infuse the ash?).	Thank you for your comment. Please see the response to comment 734.	No.
816	Cindy Nawilis		email dated 8/26/19, 2019 Draft ISWMP	H-POWER	Waste Diversion	<p>To whom it may concern:</p> <p>Thank you for sharing this comprehensive 10-year update with the public. Waste management is crucial, and especially so now as we have a global plastic crisis on our hands as well as a recycling crisis due to China's national sword policy. I bring my feedback as an individual resident who wants to see the City & County make the best decision for a sustainable future.</p> <p>In general I feel the City & County have made mostly right decisions in diverting away trash from the landfill. There's more that could be done but given the constraints that City & County staff are operating under, I think they've done a good job to date. My concern is the plan's recommendation to simultaneously pursue two conflicting strategies; when the goals as a whole are not aligned, how will the divisions within Department of Environmental Services work effectively to accomplish them? On one side the plan mentions waste reduction by source reduction being an important priority to take on for the next 10 years. But on the other side there is mention of potentially growing H-POWER to accommodate a fourth boiler with little emphasis on reducing status quo carbon emission pollution from H-POWER. These two strategies seem to be in direct conflict. At the current rate, the City & County is still paying Covanta penalty fines and reimbursing lost revenues for repeated shortages year after year on the minimum burn load quota. If the City & County are going to focus on waste reduction efforts, then the 3 existing boilers in H-POWER should be sufficient to meet the projected waste growth resulting from the island's increasing de facto population. And if that's not the case, I'd like to see that someone has done the analysis.</p>	Thank you for your comment. Please see the response to comment 942.	No.
817	Cindy Nawilis		email dated 8/26/19, 2019 Draft ISWMP	H-POWER	Waste Diversion	<p>Instead of planning on a 4th boiler, I think the City & County should fully pursue a comprehensive waste & source reduction efforts and supplement that work with a renegotiation of the Covanta contract so that the shortage penalty and lost revenue reimbursements can be reduced to lower the City & County's overall expenditures. As it is now, the mention of adding another boiler makes me question the City & County's commitment on waste reduction; is waste reduction included in the plan because it is the sexy topic of the moment and solely to assuage the concerns of groups and NGOs who care about it? There is a Working Group but I need to see the City & County fully commit to waste reduction efforts and commit to whatever recommendations the Working Group brings forth. Right now, I do not see that yet. If all the City & County does is create a Working Group that has no clout and proceeds with status quo strategy of using H-POWER to do most of the work of meeting the "nothing wasted, nothing to landfills" goal, then what is the purpose of mentioning waste reduction at all?</p>	Thank you for your comment. Please see the response to comment 942.	No.

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818	Cindy Nawilis		email dated 8/26/19, 2019 Draft ISWMP	Landfill	Waste Diversion	I'd also like to see if there is a Plan B in the event that the RFPs for recycling ash residuals from H-POWER are not received or not followed through with. If that is the case, how soon will WGSL have to be retired? This is why a comprehensive waste reduction initiative to me makes sense, because it would also extend the lifetime of WGSL. I look forward to staying updated with the next revisions of this 10-year integrated solid waste management plan. Thank you for your consideration.	Thank you for your comment. At this time, Plan B is to continue disposing of ash at WGSL while the City investigates whether other options exist. Continued disposal of ash at WGSL is the worst case scenario in terms of future capacity, and was accounted for when calculating the projected 2038 landfill closure date. If the City succeeds in diverting more materials from the landfill (e.g., ash RFP process establishes beneficial reuse practices), the year 2038 projection can be extended even further.	No.
820	Katharina Anhalt, MBA Sustainability Management		email dated 8/26/19, 2019 Draft ISWMP	Biogas	Wastewater Treatment	Human waste: Wastewater facilities on Oahu have already realized the impact of methane and, to a small degree, capture it. This effort should be increased and biogas from wastewater treatment plants increasingly used for electricity production or fed into the natural gas grid.	Thank you for your comment. Please see the response to comment 1027.	No.
821	Katharina Anhalt, MBA Sustainability Management		email dated 8/26/19, 2019 Draft ISWMP	Glass	Local Options	Recycling: With countries of the global south less willing to take US recycling for processing, local options should be extended: A solar powered glass recycling facility should be created on island, to avoid having to ship glass off island, which uses a lot of fuel. Mason jars sell for a high price. Glass jars produced on site could be used by local food producers.	Thank you for your comment. Please see the response to comment 735.	No.
822	Katharina Anhalt, MBA Sustainability Management		email dated 8/26/19, 2019 Draft ISWMP	Biogas	Energy Production	To sum up, most of my suggestions include the use of methane in a designated electricity producing biogas facility. As Oahu's old electricity grid struggles to maintain a stable grid frequency under the influence of fluctuating solar energy, biogas is a great addition to Oahu's energy mix: It can be stored and, in case of sudden increased need, fired up fast. This way, a former climate change causing waste byproduct can be used as a resource, reducing the need of fossil fuel to be shipped to the island. Thank you very much for your attention to my thoughts. If you have any questions, please don't hesitate to reach out to me via email katharina.anhalt8@gmail.com.	Thank you for your comment. Please see the response to comment 1027.	No.
823	Harvy King, Sustainability Student Assistant	WCC	email dated 8/26/19, 2019 Draft ISWMP	General	General	Attached is a document with my statement/ comment, and below is supporting material to one of my recommendations. Hope this helps. https://drive.google.com/file/d/1SGR5ELLbnt5gy0_hdG0GQDvll3pjX_kh/view?usp=sharing Harvy WCC Sustainability Student Assistant	Thank you for your comment.	No.

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824	Harvy King, Sustainability Student Assistant	WCC	email dated 8/26/19, 2019 Draft ISWMP	Source Reduction	Increase	<p>I am Harvy a resident of Manoa, Navy veteran, student of Windward Community College, a member of Student Sustainability Hui, Surfrider Foundation member, Society for Conservation Biology Outreach Chair, and today I speak as an Independent and Sovereign Man of our Island Earth. I believe we need to adjust our worldview on waste. In the 243 years since the inception of the United States this country has experienced 12 wars and 17 recessions. The association of waste, war, and economics are often heavily intertwined. I recently visited a local scrapyard called Ace Iron Recycling where a gentleman, Sebastian, educated me on the identification of older homes by the fact that they used yellow brass in the plumbing which later became disincitvized, and was adjusted to the use of copper instead, because yellow brass is what you make bullets out of; yellow brass, Sebastian explained was a liability to have in the public's hands. Sebastian went on to express how badly the the price of scrap and therefore his business was affected by the Trump administration, in the last few years. The reason I share this experience is because it highlights the principle of the importance of our worldview perspective of waste management. According to the current world view, since 2015 the price of scrap has been going down making room for raw material extraction. Although the industrial process of raw mineral extraction creates many jobs and is good for the economy in the short term, it is bad for the environment, destroying the air we breathe, the water we drink, and spreading war across the land which we are not separate from. Understandably, scrap metal is only one category of "special waste" among many waste streams, it underlines our worldview of waste. I propose and submit an improved worldview to the City.</p> <p>A Hawaiian elder & teacher once expressed to me his genealogical connection to a prominent historical Hawaiian high priest, Ka'opulupulu. The word Pūlupulu (I recently referenced in a proverb) Pipi ka wahie, ho'ouui i ka pulupulu; or, if wood burns slowly, add more tinder. Separately, ho'opulupulu means to make compost. I implore you to help set the precedent across the world and use traditional knowledge to manage more appropriately our waste, better understood as the carbon cycle. Brah, no waste nothing..</p>	Thank you for your comment. The City agrees that source reduction and reuse are critical components of waste management on Oahu.	No.
825	Harvy King, Sustainability Student Assistant	WCC	email dated 8/26/19, 2019 Draft ISWMP	Source Reduction	Support for Goals	Thank you for your commitment to 70% waste reduction by 2030. In the spirit of what's happening at Mauna Kea, what would you receive if you asked a Hawaiian elder what to do with all this trash? Brah, no waste nothing.. May the life of the land be perpetuated by the righteousness of its servants.	Thank you for your comment. The City appreciates your support of our waste reduction goals.	No.
826	Harvy King, Sustainability Student Assistant	WCC	email dated 8/26/19, 2019 Draft ISWMP	Source Reduction	Waste Diversion	The scale reference between small scale and industrial scale models require the populace to change behavior as well as we must make profound adjustments to commercial models. It's ok to be afraid of dramatic change just like we jump in the deep blue sea so we can learn how to surf.. learn how to navigate. Too often has scope of waste management been what the best way to pass the buck really is. Like we can just burn our responsibility. The punchline of this plan, between green waste and food waste should be agriculture. Food production and security. In summary, along with my proposition, I include two recommendations, please work with STEWMAPS of the US Forest Service, and please investigate City & County EIS Waikane Valley Culture Park as a potential location to feature a waste diversion center (Compost & Recycling Facility).	Thank you for your comment. The City will follow up with the Park to explore opportunities.	No.

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827	Erik Meade		email dated 8/27/19, 2019 Draft ISWMP	Recycling	Plastic #5	In Chapter 9, section 9.3.4 Plastics there is no mention of plastic #5. Plastic #5 is a plastic commonly used in bottle caps. Bottle caps are high in the list of most deadly ocean trash. Seas at Risk ranks bottle caps at #5. https://seas-at-risk.org/publications-and-videos-2/members-news/762-over-10-000-beverage-bottle-caps-collected-and-analysed-from-the-dutchcoast.html	Thank you for your comment. Please see the response to comment 829.	No.
828	Erik Meade		email dated 8/27/19, 2019 Draft ISWMP	Recycling	Plastic #5	As plastic #5 is not accepted at HI 5 recycling centers one frequently finds concentrations of bottle cap litter where people who collect HI 5 plastic bottles have carelessly tossed them on the ground, detracting from Hawaii's natural beauty and increasing the chance they will end up in the ocean. The technology to recycle plastic #5 is nearing the consumer market. https://preciousplastic.com/en/machines.html There is an opportunity to recycle plastic #5 here on the islands turning it into 3D printer filament and sold.	Thank you for your comment. Please see the response to comment 829.	No.
829	Erik Meade		email dated 8/27/19, 2019 Draft ISWMP	Recycling	Plastic #5	In addition Plastic #5 is also used in yogurt, syrups, and other food containers. Can this plan evaluate this technology in the appropriate section?	Thank you for your comment. Due to the emerging nature of this technology, further demonstration of feasibility would be needed before evaluating for implementation.	No.
830	Severine Busquet		email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	Waste Reduction Policies	I am a resident of Honolulu living in Hawaii Kai (96825). I am very sensitive to your important work and plans on waste management. So concerned about the amount of trash our society keeps producing and managing, I am in the process of creating a non-profit organization Positive Impact 808 focused on reducing our waste through composting and upcycling. I have read the draft Integrated Solid Waste Management Plan Update dated September 2019 and available on the City and County (C&C) of Honolulu Department of Environmental Services website. Please find below my comments about it. Although I appreciate the commitment to reducing solid waste per capita by 25% by 2030, I would like to hear a stronger goal close to zero-waste. In addition, the document cruelly lacks for actionable ways to reduce waste. - Waste reduction policies mentioned in Section 3.4.4. (bulk purchasing, material reuse, etc) should be detailed and expanded in order to allow Honolulu residents zero-waste living which is nowadays a quasi-impossible challenge. These policies should also provide consumer incentives to advocate for Extended Producer Responsibility mentioned in section 3.4.8. Modernizing BYO container policies should also be included to promote the use of BYO containers and to ban non-compostable utensils.	Thank you for your comment.	No.
831	Severine Busquet		email dated 8/27/19, 2019 Draft ISWMP	Public Education	Coordinator Position	- If education is the cornerstone of the waste reduction plan, there needs to be a dedicated staff person. Right now the plan is non-committal about hiring an education specialist. It is stated in section 3.4.2 that the City will investigate the feasibility of hiring a Public Education Coordinator. Can the revenue from H-POWER energy sales be used to pay for an education specialist position? I also suggest to provide small grants to community partners that are already doing waste reduction education in lieu of the C&C behalf.	Thank you for your comment. Please see the response to comment 731.	No.

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832	Severine Busquet		email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	SRWG	- Regarding the Source Reduction Working Group, it would be interesting to state precisely how the group feedback will be incorporated into the waste management strategy, what are the outcomes, timelines, etc.. Can an outcome of this group be to create a Zero Waste Plan that the City will commit to follow? Student and community member should seat on this committee.	Thank you for your comment. The Plan indicates that recommendations from the SRWG shall be delivered to the appropriate parties, including the Mayor, City Council, the Director of the Department of Environmental Services, and the Office of Climate Change, Sustainability, and Resiliency. Commitments from all parties will be needed to ensure implementation of SRWG recommendations.	No.
833	Severine Busquet		email dated 8/27/19, 2019 Draft ISWMP	Food Waste	Composting and Residential Ban	- Although food waste management is one of the most effective methods to alleviate the global climate crisis, I could not find any concrete plans to develop composting. Furthermore, up to 60% of the waste generated on the island according to section 2, are organics (36%) and paper (23%) which is almost the perfect recipe for composting. However, there is currently no residential food waste mitigation or policy and only large businesses must divert food waste from H-POWER in Honolulu. This means massive amounts of food waste are being burned at H-POWER from small restaurants, stores, businesses, and residents leading to pollution. We need to create through funding a microgrid of composting projects providing composting solution to stores or neighborhoods all around the island. The 2019 document should detail plans for: 1) financial support from C&C along with permitting support from the State Department Of Health to pursue localized, community composting solutions, and/or 2) municipal food waste composting, and 3) expanding the food waste ban to include residents and small businesses (Chapter 9, Section 9-3.5 of the Revised Ordinances of Honolulu).	Thank you for your comment. Please see the response to comment 728.	Yes.
834	Severine Busquet		email dated 8/27/19, 2019 Draft ISWMP	Glass	Local Options	- Shipping glass to be recycled is greenhouse gas (GHG) intensive and reusing bottles prevents emissions from the recycling process. The plan should support local glass reuse and washing along with the more intensive glass crushing.	Thank you for your comment. Please see the response to comment 735.	No.
837	Severine Busquet		email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	Single Use Plastics	Finally, I am glad to hear the goal of reducing plastic going to H-POWER to limit GHG emissions from H-POWER. However, reduction rate higher than 1% should be targeted. This plan explores burning recyclables at H-POWER as a solution to the currently weak recycling market. Burning recyclables is a band-aid for the core issues that we produce too much stuff that must be thrown away which includes packaging. The City should commit to waste reduction through aggressive policies to reduce single-use items and to promote certain amount and type of packaging that could be used to ship products to Hawaii. Selected packaging material should be compostable or at least a better combustible than plastic. If the City is willing to renegotiate recycling state policies to allow for burning, the City should instead direct that energy to working on source reduction policies. Hoping these comments can be useful to your committee. Staying available if you have any questions. Severine Busquet	Thank you for your comment. The City supports the reduction of single-use plastics and aims to work with other stakeholders to identify future reduction strategies as part of the SRWG.	No.

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839	Christian Palmer		email dated 8/27/19, 2019 Draft ISWMP	ISWMP Update Process	Public Engagement	Overall the new plan needs to be more creative and visionary, not just a continuation of the ways things are already going. In order to achieve this, more voices from the community need to be included in the planning process. Mahalo, Christian	Thank you for your comment. The City has made a number of changes to the Plan as a result of input received during the public comment period and looks forward to the opportunity to continue to work with key stakeholders on innovative waste solutions as part of the SRWG.	No.
840	Andrea Devon Bertoli, Chef, Educator, Author		email dated 8/27/19, 2019 Draft ISWMP	Climate Change	Increase Efforts	Thank you for your time and energy spent on this Integrated Solid Waste Management Plan, and for being open to cooperation with local citizens and action groups. I had the opportunity to attend the hearing in Kapolei last month, and I thank the team for the opportunity to present both questions and testimony. One of the themes that was repeated frequently from the crowd is the request for urgency and direct action with the plan, which I would like to reiterate. As many of the attendees noted, Honolulu (and the world) is facing a climate emergency, and I encourage your team and the City & County of Honolulu, to acknowledge that the current version of the Waste Management Plan can become a more forward-thinking plan, and have Honolulu become a leader in waste diversion and become a success story for the world to emulate.	Thank you for your comment. Please see the response to comment 793a.	No.
841	Andrea Devon Bertoli, Chef, Educator, Author		email dated 8/27/19, 2019 Draft ISWMP	Composting	Small-Scale	I have three particular areas of concern in the ISWMP plan as written, and three primary points I would like to encourage the committee to include in revisions of the plan: <ul style="list-style-type: none"> Composting: I'd like to see expansion of existing green waste diversion (which comprises a huge percentage of total waste, according to your own report and presentation). Green waste is useable, beneficial material that can be eliminated from the waste stream. Adding to that, reworking the food waste rules (in partnership with the Department of Health) is key to creating a viable, healthy compost that is a value-add to the City & County. While composting has been considered too expensive thus far in your planning process, I urge the committee to consider smaller-scale, pilot projects that can help improve our green waste and food waste diversion rate in locations around the island. As a former farmer and a current avid home gardener, I am always frustrated with the lack of local options for soil and compost. I encourage the team to visit Ohana Greenhouse & Garden Supply on Sand Island (and other islands) to see the array of compost and soil options available (at significant cost). These products are shipped in from the north coast of California, instead of being sourced and packaged locally. I am certain that most farmers and gardeners would prefer to use locally-made compost and soils if they were healthy and vibrant. Not only is this a good solution to our waste issues, a value add for the city, and a potential job opportunity for the taxpayers, compost and food waste diversion is a huge carbon drawdown and can help Honolulu lead the world in taking drawdown actions to improve our climate. 	Thank you for your comment. Please see the response to comment 728.	Yes.

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842	Andrea Devon Bertoli, Chef, Educator, Author		email dated 8/27/19, 2019 Draft ISWMP	Recycling	Residential Collection	<p>● Reduction of Recycling Bins: During the hearing it was explained that there is potential for reducing or eliminating blue bin pick pickups, citing not enough usage of the bin during the review process. Yet the team acknowledged that there was no concurrent/simultaneous review of grey/rubbish bins at the same households. I have lived in many areas of the island during my 20 years here (Waialua, Kalihi, Ala Moana, Kaimuki) I know from experience that most people are misusing the bins, adding recyclables to the rubbish bins, and adding rubbish to recycling bins. The solution is not less recycling pickups, but more information. For that, I strongly support the hiring and training of at least one education specialist to educate Oahu's residents about proper bin usage.</p>	Thank you for your comment. The City agrees that proper sorting is essential, and performs inspections of carts and issues reminders or error notices if contamination is found. Requests for additional gray carts are denied if the existing gray carts are found to contain recyclables. Additionally, the City is working to hire a Public Education Coordinator to better engage the public regarding the importance of recycling.	No.
843	Andrea Devon Bertoli, Chef, Educator, Author		email dated 8/27/19, 2019 Draft ISWMP	H-POWER	Waste Diversion	<p>H-POWER: I would like to see the plan focus on source reduction rather than building a fourth boiler. Incineration of rubbish is a short-term response to a larger-scale, longer-term problem, and generates its own environmental issues – it's a very unviable goal to pursue waste-to-energy at this time. We know that H-Power is not a long-term sustainable option both for emissions reasons, but also for cost reasons. This expansion of the existing H-Power plant will do only a financial disservice to our taxpayers.</p>	Thank you for your comment. Please see the response to comment 733.	No.
844	Natalie Wohner, M.Sc. Materials Science and Engineering, PhD Candidate Hawai'i Corrosion Laboratory, University of Hawai'i at Manoa	Surfrider Foundation Oahu Chapter Ocean Friendly Restaurants Co-Coordinator Vice President - Surfrider Foundation UH Mānoa Student Chapter	email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	Strategies	<p>Thank you for giving me the chance to give comments to the Draft Update of the 2019 Integrated Solid Waste Management Plan.</p> <p>In my opinion the plan is going in the right direction but lacking a few major points:</p> <p>Improve Waste Reduction Practices</p> <ul style="list-style-type: none"> ● Commit for a higher waste reduction ● Enact strong policies that push for circular economies a. Ban on single-use plastics b. Higher deposit fees on recyclable bottles (and recycle them locally) ● In Europe there is a 0.30 USD per bottle and there are returning stations in every supermarket ● On Oahu we can already see a huge impact of the 0.15 USD bag fee in supermarkets ● Ensure enforcement of policies ● Introduce financial incentives to change the habits of consumers, retailers and manufacturers ● Finance more research and development of alternative materials ● Raise awareness among consumers through education 	Thank you for your comment. The City will forward these suggestions to the SRWG for consideration.	No.

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845	Natalie Wohner, M.Sc. Materials Science and Engineering, PhD Candidate	Surfrider Foundation Oahu Chapter Ocean Friendly Restaurants Co-Coordinator Vice President - Surfrider Foundation UH Mānoa Student Chapter	email dated 8/27/19, 2019 Draft ISWMP	Recycling	Local Options	<p>Create a Local Recycling System - Instead of Burning them</p> <ul style="list-style-type: none"> • Develop a plan for a better recycling program, for example: <ul style="list-style-type: none"> a. Learn from Europe and install returning stations in each supermarket for glass and plastic bottles, and metal cans b. Increase deposit fees to ensure consumers return recyclable items c. Build local recycling facilities that reuse those bottles • We need more itemized recycling bins in public and for households (glass, paper, plastic etc), therefore we need more funds to establish a proper collection system and education • Ensure plastic products and recycling bins are properly labelled and the public is better educated on what to recycle. 	Thank you for your comment. The Plan includes initiatives to increase the number of recycling containers in public locations and identify City- and State-owned parcels on which to locate additional HI-5 program redemption centers. The City is also working to hire a Public Education Coordinator to better engage the public regarding the importance of recycling.	No.
846	Natalie Wohner, M.Sc. Materials Science and Engineering, PhD Candidate	Surfrider Foundation Oahu Chapter Ocean Friendly Restaurants Co-Coordinator Vice President - Surfrider Foundation UH Mānoa Student Chapter	email dated 8/27/19, 2019 Draft ISWMP	Food Waste	Composting	<p>Build an Industrial Composting Facility</p> <ul style="list-style-type: none"> • Create a system to compost food waste locally. • Add a bin for households to separate food waste and compostable products. 	Thank you for your comment. Please see the response to comment 728.	Yes.
847	Natalie Wohner, M.Sc. Materials Science and Engineering, PhD Candidate	Surfrider Foundation Oahu Chapter Ocean Friendly Restaurants Co-Coordinator Vice President - Surfrider Foundation UH Mānoa Student Chapter	email dated 8/27/19, 2019 Draft ISWMP	H-POWER	Waste Diversion	<p>Minimize Burning Trash at H-Power</p> <ul style="list-style-type: none"> • Please don't greenwash the public with selling H-Power as a "clean energy source", yes it creates energy and saves space in the landfill, but also boosts out three times as much GHG as the coal plant next door. • Stop making contracts with Covanta for fulfilling a trash quota which ultimately works against all the points mentioned above! • Develop better filters for toxic emissions produced by burning trash at H-Power • Let's minimize the waste we burn, and not add more waste by burning recyclables and get another fourth burner 	Thank you for your comment. Please see the response to comment 906.	No.

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848	Natalie Wohner, M.Sc. Materials Science and Engineering, PhD Candidate Hawai'i Corrosion Laboratory, University of Hawai'i at Manoa	Surfrider Foundation Oahu Chapter Ocean Friendly Restaurants Co-Coordinator Vice President - Surfrider Foundation UH Mānoa Student Chapter	email dated 8/27/19, 2019 Draft ISWMP	General	General	In summary, to make this system work and advance the City towards a circular economy, we need experts in the field that work on Waste Reduction and Education, and the city should commit in including the public and students to have an equal voice! Mahalo for considering my input and I trust in you all doing the right thing in protecting our precious environment! Sincerely, Natalie Wohner	Thank you for your comment. The City looks forward to the opportunity to continue to work with key stakeholders on innovative waste solutions as part of the SRWG.	No.
849	Lindsay Stovall, Director, State and Regulatory Affairs	American Chemistry Council	email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	SRWG	To: Laurie Kahikina Director, Department of Environmental Services The American Chemistry Council (ACC) appreciates the opportunity to comment on the City and County of Honolulu's Draft 2019 Integrated Solid Waste Management Plan (ISWMP). ACC's comments are primarily focused on the aspects related to source reduction and the suggested Source Reduction Working Group (SRWG) that would be established pursuant to the Plan.	Thank you for your comment.	No.
850	Lindsay Stovall, Director, State and Regulatory Affairs	American Chemistry Council	email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	Packaging	<u>Source Reduction</u> Attention is rightly turning to the overall volume of consumer waste generated by the way in which we use products, and many are looking for ways to reduce or eliminate wasteful uses of products. Any discussions on this issue should be informed by scientific data, reflect input and expertise from the packaging industry, food service providers, and others and ensure meaningful recovery of all packaging materials.	Thank you for your comment. The City supports this idea and has included competitive grant programs to support innovation on the list of initiatives for consideration by the SRWG.	No.
851	Lindsay Stovall, Director, State and Regulatory Affairs	American Chemistry Council	email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	Net Reduction in Waste	The goals within the ISWMP should be based on quantifiable net reductions in solid waste. We strongly believe that trading one material for another should not count as numeric progress toward solid waste goals. Instead, solid waste management plans should consider all materials and technologies in the discussion on overall waste reduction. Focusing on one material type or solution will not lead to meaningful reductions in overall waste, but merely shift the composition of waste to alternative materials.	Thank you for your comment. The City will take it into consideration when assessing source reduction strategies moving forward.	No.
852	Lindsay Stovall, Director, State and Regulatory Affairs	American Chemistry Council	email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	Net Reduction in Waste	In fact, litter studies conducted following the enactment of bans have shown an increase in the litter of alternative materials that is greater than the decline in the banned material. This was a primary reason why the California Water Board rejected the use of bans as a compliance mechanism for waterborne trash reduction. ¹ Furthermore, the City Auditor of Honolulu, HI stated in a December 2018 audit to the City and County Council, "Polystyrene food containers are a small portion of litter and banning them would not meaningfully reduce the volume of litter or trash." ²	Thank you for your comment. A number of restaurants on Oahu have adopted "straws upon request" programs and other voluntary measures. The City hopes to identify opportunities to work with restaurants to expand voluntary efforts through the SRWG.	No.

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853	Lindsay Stovall, Director, State and Regulatory Affairs	American Chemistry Council	email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	Opt-In Strategies	There are some commonsense first steps that can be easily employed to assist in educating the public to be more mindful about reducing the products they consume. For example, some cities and states are adopting “straws upon request” policies, where customers must request straws with their meal. This simple change means that straws are only given to the customers who need them, but not to customers who bring their own straw or do not want a straw. This creates a win-win, as restaurants save money on straws and non-straw users aren’t stuck with an item they don’t need or want. Carefully analyzing other consumer processes can likely find similar opportunities for “opt-in” strategies which can help to spur cooperative approaches with local businesses.	Thank you for your comment. The City agrees that reliable data and stakeholder input are important when considering source reduction measures for implementation.	No.
854	Lindsay Stovall, Director, State and Regulatory Affairs	American Chemistry Council	email dated 8/27/19, 2019 Draft ISWMP	Food Waste	Packaging	There are a wide variety of challenges in the parallel goals of reducing food waste and increasing source reduction. It is easy to assume that reducing the amount of packaging used for food would lead to less waste. However, ten times more resources are used to make and distribute food than are used to make the packaging to protect it ³ . Fruit and vegetables tightly sealed in protective plastic are more likely to reach the dinner table than unpackaged fruit and veggies. Plastic food packaging has the ability to help prevent food waste and reduce environmental effects while keeping foods fresh and sanitary ⁴ .	Thank you for your comment.	No.
855	Lindsay Stovall, Director, State and Regulatory Affairs	American Chemistry Council	email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	Lifecycle Analysis	Plastics are often used because the material can do more with less. Plastics help reduce greenhouse gas emissions, require less energy and water to produce, require less fuel to transport, and help significantly reduce food waste. ⁵ All packaging leaves an environmental footprint regardless of the material type. It takes energy and raw materials to produce, transport, and recover or dispose of any material, so it is important to measure all of these impacts throughout the entire lifecycle of a product.	Thank you for your comment.	No.
856	Lindsay Stovall, Director, State and Regulatory Affairs	American Chemistry Council	email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	SRWG	<u>Source Reduction Working Group</u> The Draft ISWMP notes the challenges in implementing source reduction programs and recommends the establishment of a Source Reduction Working Group. “Many source reduction initiatives require further evaluation of economic, social, and environmental factors to determine feasibility, as well as support from stakeholders outside the City to achieve implementation.” 3.4.1 Source Reduction Working Group (SRWG) We strongly encourage the City and County to ensure that impacted business and their customers are adequately represented on the SRWG. We also request that the City and County adopt specific parameters to guide the SRWG’s recommendations. The working group should include a broad representation of impacted businesses as well as consumer advocates and nongovernmental organizations to provide the expertise necessary to properly consider the economic, social and environmental factors of any policies considered by the working group.	Thank you for your comment. The City agrees and is working to identify a diverse group of stakeholders to participate in the SRWG. The Plan includes a list of factors that the SRWG will consider when evaluating potential initiatives.	No.

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857	Lindsay Stovall, Director, State and Regulatory Affairs	American Chemistry Council	email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	SRWG	<p>We recommend the following:</p> <ul style="list-style-type: none"> • The City should ensure broad stakeholder engagement by including representatives of the following groups: <ul style="list-style-type: none"> o Local manufacturers o Local business community (Chamber of Commerce) o Local restaurants (Hawaii Restaurant Association) o Small, local business owners who have been in business more than 15 years o Anti-litter organizations (Keep the Hawaiian Islands Beautiful) o A consumer representative 	Thank you for your comment. The City will keep it in mind when finalizing the SRWG.	No.
858	Lindsay Stovall, Director, State and Regulatory Affairs	American Chemistry Council	email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	SRWG	<ul style="list-style-type: none"> • The City should adopt more specific parameters as a part of the ISWMP to help guide the SRWG and ensure that their recommendations are viable and quantifiably effective. Some key questions the City and County should direct the working group to consider in their development of recommendations include: <ul style="list-style-type: none"> o Will the recommendations and any accompanying proposed guidelines actually reduce waste or rather simply result in replacing one type of trash with another? o Are there environmental impacts (e.g. energy use, water use, impacts on greenhouse gas emissions, trash generation, landfill waste, etc.) associated with the manufacture, distribution, use and disposal of likely alternative replacement products? o Are likely replacement products recycled or composted within the State's existing infrastructure and do viable, end use markets exist for these products? 	Thank you for your comment. The City will include the recommended key questions in the Plan as appropriate.	Yes. Revised Appendix A to include the proposed items.
859	Lindsay Stovall, Director, State and Regulatory Affairs	American Chemistry Council	email dated 8/27/19, 2019 Draft ISWMP	Plastics	Waste Reduction	<p>Recent policy actions imposed by China are creating new challenges – but also opportunities – in how plastics and other commodities are recycled and managed domestically. ACC has set ambitious sustainability targets and our members are taking steps to utilize recyclable packaging, increase recycling rates, and incorporate recycled material in the production of new packaging. Additionally, global companies in the plastic value chain including many ACC members recently announced the creation of a new non-profit called the Alliance to End Plastic Waste. This new group is committing \$1.5 billion over five years to end plastic waste in the environment through new packaging formats, more efficient recycling technologies, and new business models to create value in used plastic.</p> <p>Thank you in advance for considering our views. If you have any questions please do not hesitate to contact me at 916-448-2581 or via email at Lindsay_Stovall@americanchemistry.com. You may also contact ACC's Hawaii based representative Ross Yamasaki at 808-531-4551.</p>	Thank you for your comment and the information.	No.
860	Monika Haar		email dated 8/27/19, 2019 Draft ISWMP	Food Waste	Community Collection Bins	I have seen large composting bins at every farmers market in NYC, where the residents have a place to dispose their organic material on a weekly basis. This allowed residents an easy and accessible way to dispose of their compost, and it provides nutritious materials for the farmers to generate healthy soil.	Thank you for your comment. We will forward this idea to the SRWG for consideration.	No.
861	Monika Haar		email dated 8/27/19, 2019 Draft ISWMP	Composting	EM	My household has been a big supporter of EM (https://www.emhawaii.com/), which was initially developed in Japan. They are microorganisms that help to break down compost more quickly and efficiently. EM allows for more composting than the traditional ways, and breaks down seeds, meat, and bones. This way, a larger percentage of food waste can be diverted from the landfills.	Thank you for your comment and the information regarding EM.	No.

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862	Monika Haar		email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	BYO Take-Out Containers	<p>Promoting BYO containers in stores and restaurants will help greatly in waste reduction. Restaurants, stores, and supermarkets are known to produce the highest amount of plastic waste.</p> <p>I appreciate your time in considering these ideas, and hope it can make a difference in a cleaner future for Hawai'i. We can certainly follow the footsteps of other cities such as NYC and SF that are paving the way for waste reduction.</p>	Thank you for your comment. Please see the response to comment 726.	No.
865	Anete Jayaweera		email dated 8/27/19, 2019 Draft ISWMP	Zero Waste	Incorporate Concepts	<p>As a contributing member of society, I would like to see Zero Waste concept incorporated in the early education to raise awareness as these individuals mature, hopefully fully aware of ways to only positively impact the environment. I am concerned with the overproduction of plastic and other goods that end up in the landfill. By incorporating policies and laws that limit overproduction would save the taxpayers' dollars to be spent on roads and infrastructure, rather than paying for energy to burn waste, while truthfully causing just as much harm by releasing the toxins in the atmosphere, that later cause illnesses.</p>	Thank you for your comment. Please see the response to comment 737.	No.
866	Anete Jayaweera		email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	Increase	<p>Within the recent years, Hawaii has already been a great role model to other states with our forward thinking on green energy and zero carbon footprint goals. I believe the public is ready to inspire other states to do better with their reduced use of plastics. I believe this will inspire more innovation to come up with alternatives and result in healthier decisions. This will ultimately lead to more businesses, more jobs and healthier and happier population.</p> <p>I truly appreciate your time to hear my voice, and I truly believe in our government to make safe and healthy choices for our people. Thank you for all that you do.</p> <p>Sincerely, Anete Jayaweera</p>	Thank you for your comment. The City will take it into consideration when assessing source reduction strategies moving forward.	No.
867	Dale Evans		email dated 8/27/19, 2019 Draft ISWMP	HHW	Residential Collection	<p>I have a problem with the hazardous waste disposal system, which is not very user friendly. You have to make a list of materials and quantities, then go somewhere in town to drop things off on a certain (limited) date and timeframe (and, I don't have a vehicle adequate for the transport.) I really wish they had a service where someone would come to you and pick up the materials. Otherwise these things are going to sit around in my garage and storage cabinets until the containers evaporate and the stuff spills out.</p>	Thank you for your comment. On-site pickup would be cost-prohibitive in part because of equipment and safety requirements associated with HHW collection.	No.
868	Anny Barlow	Ocean Friendly Restaurants Hawaii	email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	Regulatory Obstacles for Restaurants	<p>My name is Anny Barlow, I am coordinator for the Ocean Friendly Restaurants Hawaii Surfrider campaign.</p> <p>We have many restaurants that want to work towards zero waste, one of the biggest obstacles for them to come over are certain regulations and processes demanded by the Department of Health (DOH).</p> <p>Where as we wish to have safety in our food and beverages, we also wish to work with the DOH to update regulations to be more fitting for our environmental health needs, while keeping us safe. This would include items such as the way straws are handled, reusables brought in by customers to have their to go orders placed in, and reusing bottles where applicable.</p>	Thank you for your comment. The City appreciates your support for Residential User Fees.	No.

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869	Anny Barlow	Ocean Friendly Restaurants Hawaii	email dated 8/27/19, 2019 Draft ISWMP	Food Waste	Restaurants	We also have many restaurants wanting to collect their food waste separately, but then have no where to put them.	Thank you for your comment. Please see the response to comment 728.	Yes.
870	Anny Barlow	Ocean Friendly Restaurants Hawaii	email dated 8/27/19, 2019 Draft ISWMP	Public Education	Coordinator Position	<p>Finally, as we have seen in our own campaign, an education coordinator is necessary as a paid position. We would also suggest in order for that positions goal to be successful, they have a marketing/communications proven track record.</p> <p>Thank you for your time and effort putting together the best 10 year waste management plan this state has ever seen! And maybe even the country! Our islands needs special care as an island society and we could be the leader in this space!</p> <p>Many Mahalos, Anny Barlow Ocean Friendly Restaurants Hawaii</p>	Thank you for your comment. The City will prioritize marketing and communications experience when hiring a public education coordinator.	No.
871	George Yarbrough, Co-Founder	Impact Hub HNL	email dated 8/27/19, 2019 Draft ISWMP	Waste Reduction	Goals	<p>I am happy to see that the ISWMP is making headway into progressive and possible methods to utilize our waste for Honolulu citizens and I believe that as a community are willing and able to make more aggressive steps.</p> <p>1) Firstly, I am surprised that as a progressive state we are not striving for larger goals in reducing our per-capita waste generation beyond 25% by 2030. Especially as the only state to proclaim 100% renewable energy 2045, and waste reduction using the Aloha plus challenge by 70% by 2030. As a resident of HNL I would like to see this plan push us as a community to strive beyond our individual reduction of 25%.</p>	Thank you for your comment. The City also hopes that the strategies identified through this Plan and future discussion with the SRWG will result in reductions in exceedance of the 25% goal.	No.
872	George Yarbrough, Co-Founder	Impact Hub HNL	email dated 8/27/19, 2019 Draft ISWMP	Food Waste	Composting	2) I would like to see more of a focus on food composting at larger scale. I understand that H-Power necessitates a certain amount to burn based on contract, but there are other ramifications to this as well. I would like HNL to take the lead in investing in pilot projects to refocus our food waste back into the soil by smart composting methods. A good and easy way would be to model Kokua's food composting programs and how they have been able to enrich their soils for food production. These programs have incredible data to use to benefit larger programs like this one.	Thank you for your comment. Please see the response to comment 728.	Yes.
873	George Yarbrough, Co-Founder	Impact Hub HNL	email dated 8/27/19, 2019 Draft ISWMP	Recycling	Make Mandatory	3) I would like to also see commercial/business buildings be mandated to recycle paper and other plastics. We have 18,000 sf in Kaka'ako/Ward area and there are very little recycling opportunities as a large facility. My understanding is that other facilities have the same issues.	Thank you for your comment. Please see the response to comment 738.	No.

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875	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Food Waste	Composting	<p>Concerns and Opportunities to strengthen the Plan Chapter 3 and Chapter 4 Food Waste Composting & Recycling: Currently there is no residential food waste mitigation or policy and only large businesses must divert food waste from H-POWER in Honolulu. No facilities exist or are being planned for that could remove the 25-40% of compostables from the Honolulu MSW stream. This means massive amounts of food waste are being burned at H-POWER from small restaurants/stores/businesses and residents. This plan does not seek to change that and does not even give the consideration of building a co-composting facility its own discussion section. The absence of this strategy in Chapter 3 and Chapter four are unacceptable and have to be given due consideration by the County in this plan.</p> <p>☐ We have 12 years to change our GHG emissions rate to alleviate the global climate crisis, and food waste management, including co-composting, is one of the most cited and effective methods for doing that. Municipalities across the U.S. and the globe are implementing co-composting infrastructure as a central pillar of their waste management plans with great success. The models exist, we only need the leadership and will to enact these strategies.</p> <p>We need: 1) municipal food waste composting through a central facility or regional networks of small-scale co-composting operations, 2) financial support from C&C (along with permitting support from the State DOH) to pursue localized, community composting solutions, and 3) The City to expand the food waste ban (Chapter 9, Section 9-3.5 of the Revised Ordinances of Honolulu) to include residents and small businesses as processing capacity increases with implementation of the above.</p>	Thank you for your comment. Please see the response to comment 728.	Yes.
876	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	County Tourist Tax	\$1	Chapter 3 - Tourist tax: We ask that the plan consider a county tourist tax of \$1.00 per visitor to support holistic and comprehensive waste management strategies. Improved systems could handle the massive impact of visitor industry waste stream on our local waste systems and support the visitor industry in prioritizing waste reduction.	Thank you for your comment. Please see the response to comment 732.	Yes.
877	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	BYO Take-Out Containers	Chapter 3 - BYO container & DOH: If the City is committed to waste reduction, collaboration with the Hawaii State Department of Health to modernize BYO container policy will be necessary. Since the City and County has stated willingness in the plan to pursue reform of other state policy (redefinition of recycling), we suggest the City work on this issue directly alongside NGOs pursuing these updates.	Thank you for your comment. Please see the response to comment 726.	No.
878	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Zero Waste Plan	Development	Chapter 3 - Source Reduction Working Group: Can an outcome of this group be to create a Zero Waste Plan that the City will commit to follow? There needs to be student and community member seats added on this committee.	Thank you for your comment. Please see the response to comment 737.	No.

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879	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	H-POWER	Waste Diversion	Chapter 4 - Burning Recyclables: Burning recyclables is a band-aid for the core issues that we produce too much stuff that must be disposed of and managed by the City. This plan explores burning recyclables at H-POWER as a solution to the currently weak recycling market. If the City is committed to waste reduction, then they should aggressively pursue policy that will reduce single-use items for recycling or burning. If the City is willing to renegotiate recycling state policies to allow for burning (currently the State of Hawai'i does not allow the counties to burn recyclables), can the City instead direct that energy to working on source reduction policies (like single-use water bottle reduction or creating a safe environment for consumers to reuse containers at eateries)?	Thank you for your comment. Please see the response to comment 906.	No.
880	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Beneficial Reuse of Ash	Health and Safety	Chapter 4 & 9 - H-POWER Ash: Before committing to the "beneficial reuse of ash," demonstrate and cite in planning docs that this material is safe to use (i.e. what happens to the heavy metals, dioxins, PCBs that infuse the ash?). No significant assurances or studies were cited in the draft plan.	Thank you for your comment. Please see the response to comment 734.	No.
881	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Glass	Local Options	Chapter 4 & 9 - Glass: Consider local glass reuse and washing along with the more intensive glass crushing.	Thank you for your comment. Please see the response to comment 735.	No.
882	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Public Education	Coordinator Position	Chapter 7 - Education: If education is the cornerstone of the waste reduction plan, there needs to be a dedicated staff person. Right now the plan does not account for that and is non-committal about hiring an education specialist (stating the City will "plan to investigate the feasibility" of hiring someone). This plan, and the City, must commit to this as a central strategy. Can the revenue from H-POWER energy sales be used to pay for an education specialist position? We also suggest following Maui County's lead to provide small grants to community partners that are already doing waste reduction education on behalf of and to the benefit of the County. ☐ Include specific metrics for measuring efficacy, explicit milestones and a general plan for measuring success.	Thank you for your comment. Please see the response to comment 731.	No.
883	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	H-POWER	Waste Diversion	Chapter 8 & 10 - H-POWER: We do not want a fourth boiler, so let's not plan for it! Instead, let's plan to make less trash and renegotiate the H-POWER contract terms so we do not have to deliver 800,000 tons of trash each year.	Thank you for your comment. Please see the response to comment 942.	No.
884	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	H-POWER	Pros and Cons	Chapter 10 - H-POWER: The descriptions of WTE in this chapter are glaringly unbalanced toward the positive, and the negative drawbacks (fiscal, environmental, contractual) of committing to this technology solution are glossed over. Please amend this section to be a true and honest comparison of the pros and cons of incineration that will inform the City's planning decisions. As it stands, this chapter serves only to validate past and planned commitments to incineration over other, equally plausible strategies with fewer drawbacks.	Thank you for your comment. Please see the response to comment 951.	No.

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885	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	General	Primary Plan Objectives	Specific section and subsection comments: 1. Exec. Summary a. Stated Primary objectives are only recovery and diverting from landfill - is this based on a statute section explicitly stating these objectives, or is this a perceived set of objectives determined by ENV? Please clarify. b. If only perceived primary objectives, Recommend amending this section to read: "This Plan details the City's primary solid waste management objectives for designing and managing an integrated system to maximize <u>source reduction to minimize generation of waste</u> , the recovery of solid waste and minimize the amount of waste that requires landfill disposal."	Thank you for your comment. The Plan text will be modified as recommended.	Yes. Revised Executive Summary text as recommended.
886	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	SRWG	3. Source Reduction and Reuse Section 3.1 second set of bullets include comment "The City also adopts, in Section 4, a measurable goal for landfill diversion ..." Include verbiage on ensuring recommendations of working group are given weight and preference to meet the stated goals of source reduction.	Thank you for your comment. The Plan text will be revised as recommended.	Yes. Revised Section 3.1 as recommended.
887	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	Reuse Organizations	3.3.2 Promotion of Reuse Organizations Comment: Acknowledgment of these organizations' work and contribution to source reduction goals is useful, absolutely, but this seems like an opportunity for the County to detail ways in which it can support these organizations' missions and increased impact through infrastructure, funding, administrative support. There are other municipalities in which, to further the shared goals of source reduction, counties are willing to offer, for example, land or access to hauling trucks at reduced rates to support. The main point being that there is an opportunity here for County to offer more to support these orgs than website reference. Please consider expanding on this section to include additional means of support for these organizations that perform critical services that benefit the county and further the Refuse Divisions/ISWMP goals. (small project/demonstration loans, equipment, land lease, network sharing)	Thank you for your comment. The City has identified single-use material bans as an initiative for further consideration by the SRWG.	No.
888	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Food Waste	Composting	3.3.3 Prevention of food waste Recommended Addition: Recommend including the potential for the C&C to investigate expanding the successful food waste recycling ordinance given that food scraps represent over 20% of the MSW. A central or regional network of composting facilities would ensure adequate processing capacity for increased food scrap diversion. Mention the State advocating a streamlined process with state DOH to support goals	Thank you for your comment. Please see the response to comment 728.	Yes.
889	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Food Waste	Small-Scale	3.3.4 Backyard Composting Comment: Kaua'i has had demonstrable success in reducing residential food waste in its stream by offering free composting bins in addition to workshops. Please indicate if the County would consider offering resources beyond workshops to residents to support this goal.	Thank you for your comment. The City has explored offering free composting bins at its workshops but at this time it does not have the funding available to support such a program.	No.

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890	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Public Education	Coordinator Position	<p>3.4.2 Education</p> <p>☐</p> <p>Promoting public education and awareness is key to successful source reduction, and ensuring adequate funding for educational programs is equally important. Inadequate funding limits the number and types of programs that can be provided as well as their effectiveness.</p> <p>☐</p> <p>The City plans to make changes on several fronts to increase public education and awareness, including <u>investigating the feasibility of designating a Public Education Coordinator position to serve as a centralized hub for all Refuse Division education initiatives.</u></p> <p><u>**this has to be an established, immediate priority as so many of the gaps in compliance stem from inadequate education and communications to community</u></p>	Thank you for your comment. Please see the response to comment 731.	No.
891	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	Reuse and Repair Centers	<p>Table 3-2 Source Reduction Item Action Summary</p> <p>Recommended Addition: Please consider adding a component for the C&C investigating the establishment of reuse and repair centers including repair workshops for multiple material categories (clothing, shoes, electronics, appliances, etc.)</p>	Thank you for your comment. The City understands the importance of partnering with reuse organizations to achieve source reduction, and looks forward to assessing how the City can best support these organizations through the SRWG.	No.
892	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Food Waste	Composting and Ordinance	<p>Recommended Addition: Recommend including the potential for the C&C to investigate expanding the successful food waste recycling ordinance given that food scraps represent over 20% of the MSW. A central or regional network of composting facilities would ensure adequate processing capacity for increased food scrap diversion. - precedent set by C&C pursuing State policy changes to facilitate burning of recyclables</p>	Thank you for your comment. Please see the response to comment 728.	Yes.
893	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	H-POWER	Waste Diversion	<p>Section 4 Recycling and Bioconversion</p> <p>☐</p> <p>Section 4.2.1 Legislative - last paragraph☐</p> <p>Given the volatility in the recyclable commodities market and the economic and environmental impact of processing and shipping recyclables to overseas markets, it is important for the City to continue to advocate for reuse, source reduction, EPR, and cost-effective on-island processing and recycling. In parallel, the City plans to pursue changes to laws that would give it the flexibility to send certain recyclables to H-POWER, where they will be processed into renewable energy for Oahu when markets are down.⁸⁵ This flexibility would give the City the ability to manage materials in the most economically and environmentally sustainable way possible.⁸⁶</p> <p>☐</p> <p>This final paragraph of the section leads into justification for sending recyclables to</p>	Thank you for your comment. Please see the response to comment 906.	No.
894	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Recycling	Local Options	<p>4.2.2 Current Market for Recyclables</p> <p>The examples of local end uses are pretty limited. Are there any additional examples of supported local markets/end uses on O'ahu?</p>	Thank you for your comment. Unfortunately, local end uses are limited at this time. The City hopes that the SRWG will have ideas for additional local end uses.	No.

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895	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Recycling	Community Bins	4.3.3 Public Recycling Receptacles Recommended Additional Content: Please include an estimation on what % of C&C jurisdiction areas have HI-5 receptacles, or a general idea of coverage. Do any of the parks include recycling containers in their operations?	Thank you for your comment. The City provides 375 receptacles at a variety of locations including many parks, various locations in Waikiki, the Blaisdell Center, Zoo, Honolulu Hale, Fasi Municipal Building, and Kapolei Hale. The Plan text will be updated to include this information.	Yes. Revised Section 4.3.3 to include additional detail.
896	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Recycling	Community Bins	Please Address: Are there any plans to increase the number of recycling bins in public spaces? Is the current coverage considered adequate by the C&C?	Thank you for your comment. The Plan includes an initiative to increase the number of recycling containers in public locations.	No.
897	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Recycling	PAYT	4.3.4.1 Automated Curbside Recycling Recommended Additional Content: At least a sentence should be dedicated to the awareness that the reduction in frequency of blue cart collection may interfere with planned future efforts for PAYT implementation (charging by weight or number of bags).	Thank you for your comment. The frequency of recyclables collection would be reassessed prior to implementing PAYT.	No.
898	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Recycling	PAYT	4.3.4.2 Manual Collection Areas Recommended Additional Content: This section could reference the opportunity to pilot PAYT and related waste reduction measures while transitioning these households to new collection methods including official collection bags, stickers, various sized carts, custom weight-recording arm for collection truck. These techniques have been successfully implemented in numerous other municipalities.	Thank you for your comment. Yes, a pilot program would be useful to refine the rollout of a full PAYT program.	No.
899	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Recycling	Multi-Unit	4.3.4.3 Multi-unit and Family Recycling Recommended Additional Content: “_the City will provide up to \$2,000 in program start-up reimbursement costs for multi-unit properties looking to establish a recycling program.” - Please address if this program is still available and funded. Consider adding who should be contacted to take advantage of this offer, and if it applies to organics recycling/bioconversion, as well (the county definition of recycling considers composting a form of recycling).	Thank you for your comment. This program is still available, and details including the Startup Cost Reimbursement Form and phone number of the City's Recycling Office are listed on the City's website: https://www.opala.org/solid_waste/Recycling_for_condos_and_apartments.html . Green waste is specifically covered in the form. The Plan text will be revised to include these details.	Yes. Revised Section 4.3.4.3 to include additional details.
900	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Bulky Items	Pilot Program	4.3.4.4 Bulky Item Recycling The appointment system for bulky pickup is underway. Consider updating this section to reflect the C&C's observations on implementation and the future of the appointment system.	Thank you for your comment. The Plan will be revised to reflect the current status of the pilot program.	Yes. Revisions made to Sections 1.4.1, 4.3.4.4, 4.5, 5.3.10, 5.3.12, 7.3.7.2, and 12.3.
902	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Food Waste	Food Rescue	4.3.9 Commercial Food Waste and Biosolids Recommended Additional Content: Please include the stats for food/organics making up over 20% of the MSW going to HPOWER, and how an aspirational goal should be set for increasing quality edibles donation further through supporting (financially, resource sharing, network shares) local food rescue organization and potentially expanding the 9-3.5 Ordinance to include more businesses, multi-unit dwellings (if hauling and processing capacity exists). ☐	Thank you for your comment. Please see the response to comment 728.	Yes.

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903	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Special Wastes	Batteries	<p>4.3.11 Lead Acid Batteries</p> <p>No other vendors on-island accept the various other (more common) types of batteries, and residents have no idea how to responsibly dispose of them. The opala.org site mentions the lead-acid batteries, and power tool recycling at Home Depot, but only mentions the alkaline batteries recommended for disposal in gray cart.</p> <p>Recommended Additional Content:</p> <p>Please expand this section to include disposal options for ALL of the various types of batteries beyond lead-acid (and lithium ion in the near future): carbon zinc, mercury, silver oxide, zinc air, nickel metal hydride.</p> <p>There is also no mention of industrial battery types and how those are intended to be managed. In the very near future, large volumes of industrial batteries will be ready for disposal from the renewable energy storage pilot systems, but will have to be managed on-island since they are considered hazardous and too difficult to ship off for processing. The need for planning around this issue should be at least mentioned, if no explicit plan is in place.</p>	Thank you for your comment. As far as we know, there are no businesses that accept alkaline and other regular rechargeable batteries for recycling on island. The City manages them as metal rather than batteries for recycling and currently the metals market is not in a shape that encourages their recycling.	No.
904	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Recycling	C&D Debris	<p>4.3.12 C&D Debris</p> <p>Recommended Additional Content:</p> <p>Organizations like Reuse Hawai'i have recommended that a new DPP permit classification is necessary to increase more effective building material reuse. A deconstruction vs demolition permit classification. Please consider including a reference to the potential for expanded options for C&D reuse and recycling. Deconstruction strategies are a more effective use of materials than the PVT recycling.</p>	Thank you for your comment. We will update the Plan to reference potential opportunities for C&D recycling and reuse through deconstruction.	Yes. Revised Section 4.3.12 to discuss deconstruction.
905	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	H-POWER	Move Subsection	<p>4.3.13 Energy Recovery</p> <p>Please consider including this subsection in a different area of the plan, as HPOWER (recognized in the plan's intro paragraph) is not recognized as a form of recycling by the state. Seems inappropriate to include in the Recycling and Bioconversion section, legitimizing it through implication. Please remove the Energy Recovery section.</p>	Thank you for your comment. The section notes that H-POWER helps divert materials from landfill and that ferrous and non-ferrous metals are extracted from waste and ash using magnets and an eddy current separator.	No.
906	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	H-POWER	Burning Recyclables	<p>4.4 Strategies for Additional Recycling and Bioconversion</p> <p>Recommended Additional Content:</p> <p>Multiple statements in this section make it clear that the city is determined to redefine recycling and send conventional recyclables to HPOWER. Any references, then, to recycling education in this section and chapter 7, would be highly misleading to the public and should be adjusted to reflect reality in the shift in policy, as well as the full picture of pros and cons to burning resources. A more balanced discussion of the negative consequences of HPOWER recyclables diversion (loss in public confidence, loss of decades worth of recycling education, mass confusion over policy) should be included in this and related sections of the plan.</p>	Thank you for your comment. As noted, the City is studying the greenhouse gas emissions associated with plastics recycling versus sending recyclable plastic to H-POWER and seeks a balanced approach to the economic realities of current material markets. Recycling education would be adjusted as necessary to make the process transparent.	No.

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907	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	H-POWER	Evaluate Alternatives	<p>4.4.1 Evaluate the Environmental and Economic Benefits of WTE & 4.4.2 Evaluate Expansion of Energy Recovery</p> <p>This section implies a false picture of only two choices - off-island shipping of recyclables or burning. This is the perfect section to ALSO, in addition to evaluating the "Environmental and Economic Benefits of WTE", evaluate the environmental and economic benefits of source reduction through policy and on-island reuse, rebottling infrastructure. This can be an ambitious plan where the city is investigating all options, especially the ones that are considered (in statute) a preferred management strategy (reduction and reuse over incineration).</p> <p>Please expand this section (and title) to include evaluation of multiple management and reduction strategies to address the limitations of off-island recycling shipping - like EPR policies/programs to target waste generation-reduction, or managing certain commodities with existing infrastructure (e.g. Could HER process paper and cardboard as a carbon source for composting?), etc. Please, at least, add a sentence indicating that evaluation of alternatives will not JUST look at WTE.</p>	Thank you for your comment. The City believes the range of alternatives evaluated is reasonable. The benefits of on-island recycling and source reduction are discussed elsewhere in the Plan. This study will have a narrow focus. Regardless of the outcome of this study, both source reduction and on-island recycling will be higher priorities than WTE.	No.
909	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Recycling	Residential Collection	<p>4.4.4 Optimize Curbside Collection of Residential Mixed Recyclables</p> <p>As referenced previously, the reduction in recyclables pickup sends a message that the City is NOT interested in recyclables diversion and would likely confuse and infuriate thousands of residents who don't understand why resource recovery appears to be moving backward in this county.Ⓜ</p>	Thank you for your comment. The City hopes that efforts to replace all 64-gallon blue carts with 96-gallon blue carts and provide additional blue carts upon request will help alleviate concerns.	No.
910	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Beneficial Reuse of Ash	Health and Safety	<p>4.4.7.1 Ash</p> <p>Please include in this section reference to studies demonstrating the environmental safety of beneficial ash reuse. Without proof of safety of this material, reasonably perceived as toxic and undesirable for public use projects, this section is incomplete and unbalanced. Discussions of using the incinerator ash for public works projects is frightening for many people due to the degradation and effects on air quality that occur when materials used for roads and construction erode and are inhaled by residents and visitors.</p>	Thank you for your comment. Please see the response to comment 734.	No. The City can respond to any concerns expressed outside the plan.
911	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Glass	Local Options	<p>4.4.7.2 Non-deposit Glass</p> <p>Please reference in this section the possible investigation of other reuse or rebottling technologies beyond crushing that may allow bottles to still be used for their original functions instead of the downcycling occurring with the crushing system.</p>	Thank you for your comment. Please see the response to comment 735.	No.
913	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Special Wastes	Batteries	<p>5.3.4 Lead Acid Batteries</p> <p>As noted in Section 4, please consider using these sections to touch on the full array of battery types and chemistries and how they are currently managed. If included, these sections should also indicate how that might be improved in the following 10 years.</p>	Thank you for your comment. Please see the responses to comments 903 and 912a.	No.
914	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Special Wastes	Tires	<p>Section 5.3.9 Scrap Tires</p> <p>Recommended Addition:</p> <p>Please note here if Scrap Tires would be considered a good candidate for additional EPR - funded programs in the future to decrease costs to the general fund.</p>	Thank you for your comment. The Plan text will be revised as recommended.	Yes. Revised Section 5.3.9 as recommended.

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915	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Special Wastes	Abandoned Vehicles	Section 5.3.11 Abandoned and Derelict Vehicles  "Residents can report abandoned vehicles online, by phone, and through the 311 mobile application." Can you provide a link to the online submission form or indicate if the form is hosted on opala.org?	Thank you for your comment. The Plan text will be revised as recommended.	Yes. Revised Section 5.3.11 to include a footnoted with the requested link.
916	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Bulky Items	Pilot Program	5.3.12 Construction and Demolition Debris  "Residents serviced by the Refuse Division are allowed to place limited quantities (up to 1 cubic yard) of C&D debris at the curbside for collection in the City's monthly bulky item collection service.189" Recommended: Consider updating this to reflect the rollout of the appointment service for bulky items.	Thank you for your comment. The Plan will be revised to reflect the current status of the pilot program.	Yes. Revisions made to Section 1.4.2 and 5.3.12.
917	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Special Wastes	Tires	Section 5.4.5 Work with State Regulators to Allow for Disposal of Additional Tires Recommended Clarification: Will this section address any additional toxin loads on the HPOWER scrubbers and air pollution controls? What potential impacts could there be to this move that could be included here for balanced discussion of this strategy?	Thank you for your comment. The quantity of tires being considered is not anticipated to result in any air quality pollution control challenges.	No.
919	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	E-Waste	Recycling	6.3 Electronic Waste  6.3.1.1 Legislative The additional detail added since prior drafts is appreciated, but there is still some confusion and scarcity of detail in this section. "The Hawaii Electronic Waste and Television Recycling and Recovery Law (HRS Chapter 339D) was adopted in 2008 and requires electronics manufacturers to provide recycling programs for televisions, computers, computer printers, computer monitors, and portable computers." If this is accurate, but the statement in this section referring to no existing laws prohibiting ewaste disposal in MSW or bulky pickup is also true, then there is a clear opportunity here for policy and legislation that would cover this disposal gap. Recommend Additional Content: Please expand this section to detail the specific programs that producers are offering for ewaste take-back and when/where/frequency of the events are held. Comment: If ewaste generators offer no programs for recycling or take back, or if these are unadvertised or promoted, then this section can also address the lack, and plan for holding the producers accountable to follow the mandates of HRS Ch. 339D). This is in addition to expanding EPR requirements to more adequately manage the thousands of tons of ewaste awaiting disposal or recycling. Comment: Kōkua Hawai'i Foundation hosts 18 recycling drives a year, and the vast majority is electronics (often stored for decades, representing tens of thousands of pounds) because no one is aware of their recycling options available. This is an educational opportunity certainly, but also an opportunity for expansion of recycling EPR policies beyond the current, minimally-utilized, ewaste recycling law (HRS Chapter 339D).	Thank you for your comment. The City recognizes e-waste as a critical issue and has included initiatives in the Plan to urge the state legislature to develop a state-wide solution and funding source to address the growing e-waste problem, and also encourage the state legislature to consider an Advanced Disposal Fee for electronics. Additionally, the City has committed to continuing to update the information available on the City's webpage (https://www.opala.org/solid_waste/eWaste.html) regarding e-waste donation, recycling, and retailer/manufacturer takeback programs. The Plan text will be updated to include a link to the webpage, which includes the most up-to-date information.	Yes. Additional detail and links added to Sections 6.3.2, 6.3.2.1, and 6.3.2.2.

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920	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	E-Waste	Recycling	<p>6.3.1.2 Current Waste Diversion</p> <p>As shown in Table 4-1, approximately 2,000 tons of electronic scrap were recycled in 2017. According to the 2017 Waste Composition Study, e-waste makes up approximately 1 percent by weight of the island's waste stream.221</p> <p>It is anticipated that the number of electronic items being discarded will continue to increase in the future with advances in technology. <u>Please include additional details here on what the plan is to address this anticipation!</u></p>	Thank you for your comment. In order to address the expected increase in e-waste, the City will include a new planned initiative to implement bi-monthly e-waste collection. It is anticipated that the program could be paired with HHW collection and would include drop-off with the City's e-waste recycling vendor and/or at transfer stations.	Yes. New Section 6.3.3.2 added to describe bi-monthly e-waste collection initiative. Section 6.4 and 12.3 updated to include new initiative.
922	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Public Education	Burning Recyclables	<p>Section 7: Public Education</p> <p>Section 7.2 Background</p> <p>Recommended Clarification: Re: "1. Establishment and implementation of recycling education and promotion programs;"</p> <p>Please Address: How will this directive and implementation change when/if ENV begins/continues to incinerate recyclables? How will the public be educated around this? A pro-incineration with no negatives approach as has been seen in the past several years provides an unbalanced assessment of the available options and strategies.</p>	Thank you for your comment. If the recycling program is changed, the City will establish appropriate messaging at that time.	No.
923	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Public Education	Website	<p>Section 7.3.1.1 Website</p> <p>Recommended Addition: If website use is ever considered low or in need of improving, what actions are planned to increase website usage and effectiveness of the communication of the information shared? - Note that there is a short reference to analytics in 7.4.3 section</p>	Thank you for your comment. Please see the response to comment 784.	No.
924	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Public Education	Blog and e-Newsletter	<p>Section 7.3.1.2: WasteLine Blog and e-Newsletter</p> <p>Recommended Addition: What readership does the blog receive, and is it an effective tool for the C&C? If not, what are the planned actions to increase traffic? Recommend referencing that additional strategies for increased effectiveness are listed in Section 7.4</p>	Thank you for your comment. Reach and effectiveness of the blog will be evaluated as part of the Public Education Plan development process.	No.
925	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Public Education	Hard Copy Materials	<p>Section 7.3.2.1 Recycling and Disposal Guide</p> <p>Comment: It is noted that the Disposal Guide is sent out only upon request. This guide seems like a great opportunity to get the word out. Would the C&C consider expanding the distribution to include anyone moving into a new home? Is there a possibility of coordinating with the utility companies, DMV or USPS in noting new accounts or address changes to facilitate this?</p> <p>Recommended Addition: Would encourage considering other means to distribute, or create a summary one-sheet that can be mailed to more residences, businesses and hung on the fridge, for example.</p>	Thank you for your comment. Please see the response to comment 784.	No.

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926	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Public Education	Hard Copy Materials	<p>Section 7.3.2.2 "Food: Too Good to Waste" Guide</p> <p>Recommended Clarification: What are the distribution numbers for this guide? Has the City considered creating a one-sheet of best tips that can be put on the fridge so it's more immediately visible/likely to be used?</p> <p>Recommended Clarification: Are there any measures in place to determine effectiveness of distribution and printing?</p>	Thank you for your comment. Please see the response to comment 784.	No.
927	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Public Education	BYO Bag Campaign	<p>Section 7.3.2.3: Bring-Your-Own-Bag Stickers</p> <p>Comment: BYO campaigns are fantastic and actually address source reduction. Would love to see increased partnerships with large stores and a much larger campaign of distribution and use of stickers.</p> <p>Recommended Clarification: Are there plans for a much higher-visibility partnership with major retailers across the county? These could be incredibly effective. Absolutely support high-visibility partnerships on BYO campaigns in addition to more incentives for BYO-ing in addition to the disincentive fee.</p>	Thank you for your comment. The City plans to continue to explore opportunities for promotional partnerships with major retailers as part of the greater Public Education Plan.	No.
928	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Public Education	Hard Copy Materials	<p>Section 7.3.2.4: Activity Books</p> <p>Recommended Addition: The Activity Books listed are geared toward recycling and linear models of disposal. When the books are updated next, would the City consider developing a 3Rs book that emphasizes Reduce/Refuse & Reuse actions for students in addition to recycling?</p>	Thank you for your comment. Please see the response to comment 784.	No.
929	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Public Education	Print Advertisements	<p>Section 7.3.3.1: Print Advertisements</p> <p>It is appreciated that these steps are taken to educate residents about illegal dumping and options for disposal and recycling.</p> <p>Recommended Clarification and Additions: What is the assumption for effectiveness in advertising in the newspaper about illegal dumping? Has any decrease been observed following the advertisements? Could these funds be used instead for cameras, direct signage, other enforcement efforts? Would TV and radio spots reach more guaranteed viewers? Please address in this section or 7.4.</p>	Thank you for your comment. Please see the response to comment 784.	No.

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930	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Public Education	Hard Copy Materials	<p>Section 7.3.3.2: Direct Mailers</p> <p>Recommended Clarification: What strategies are used on the mailers to get residents/business's attention to ensure they are read? Is the survey used to determine volume of read mailers?</p> <p>Recommended Addition: Please indicate if residents can request e-mailers instead to reduce waste?</p> <p>Recommended Addition: Door to door knocking campaigns have been used in other municipalities with a fair bit more success than mailers and adverts. Have these been considered for any of the educational campaigns? Please indicate in this section.</p>	Thank you for your comment. Please see the response to comment 784.	No.
931	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Public Education	Schools	<p>Section 7.3.4.2: The Learning Center</p> <p>Recommended Clarification and Addition: How are educators and schools made aware of this resource? What is the emphasis on Reduce and Reuse? Please address in this section.</p> <p>Comment: Perhaps a partnership with DOE could get this resource out to more schools.</p>	Thank you for your comment. Please see the response to comment 784.	No.
932	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Public Education	Phone Line	<p>Section 7.3.7.1: Environmental Concern Line</p> <p>Recommended Clarification: How is this resource promoted? Given the trend toward texting over calling, is there an option in the works for questions to be texted and responded to? Or a chat window option on the website like many companies have? Please address in this section any planned actions to increase use of this resource.</p>	Thank you for your comment. Please see the response to comment 784.	No.
933	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Landfill	Site Selection Committee	<p>Section 7.3.7.4 Mayor's Advisory Committee on Landfill Site Selection</p> <p>Recommended Clarification: Thank you for providing additional detail here from previous drafts. Would recommend adding a final line clarifying that such a committee is not currently active, and the County plan is to avoid building any new landfills - as indicated in previous sections.</p>	Thank you for your comment. The Plan text will be revised to reflect aspects of your comment and the recent Land Use Commission ruling.	Yes. Revised Section 7.3.7.4.
934	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Public Education	Enforcement	<p>Section 7.3.8.2 Enforcement Mechanisms</p> <p>Recommended Addition: In previous AC meetings, ENV employees indicated that a fine for continued contamination and cart misuse would likely be effective, but require an ordinance. It was noted that a violation fee could be added to the base cart system. Please indicate in this section if this is something the C&C will be pursuing or consider pursuing in the future.</p>	Thank you for your comment. The City may consider implementing fines in the future, but feels that current cart removal enforcement efforts are effective.	No.

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935	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Public Education	Coordinator Position	Section 7.4.3 "Investigate the feasibility of hiring a dedicated education specialist..." This has to become a primary, top-tier solution and commitment by the department and this plan, as the success of ALL of the listed programs depend on awareness! Recommend changing to "Prioritize the selection and hiring of a full-time public education specialist..."	Thank you for your comment. The Plan text will be revised as recommended.	Yes. Revised Sections 7.4.3, 7.5, and 12.3.
936	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Composting	Small-Scale	Section 7.4.7 Home Composting Workshops Comment: Pleased that there is an increase in frequency of these workshops, but concerned that the impact will be lower if the equipment is not also provided. Kaua'i has had a lot of success with increased home composting by offering composting bins. Please indicate if the C&C will consider allocating funding to beef up the composting workshop program.	Thank you for your comment. Please see the response to comment 889.	No.
937	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Public Education	Schools	Section 7.4.8 School Recycling Project Grant Program Recommended Clarification and Addition: Would recommend that this section make clear that funds could be used for source reduction prizes like reusable straws, cups, utensils, etc. The concern here being that teachers may just order more useless schwag that students won't ever use and continue to contribute to excess waste generation.	Thank you for your comment. The Plan text will be revised as recommended.	Yes. Revised Section 7.4.8 as recommended.
938	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Public Education	Tours	7.4.9 Tour de Trash and Recycling Presentation Development Update to reflect the addition of the Reuse Tour de Trash in 2019.	Thank you for your comment. The Plan text will be revised as recommended.	Yes. Revised Sections 7.3.6.1 and 7.4.9 to capture new 2019 reuse-focused tour.
939	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Landfill	Future Siting	Table 7 -1 Recommended Clarification: "Action Item: Establish a strategic siting committee (MACLSS) for future landfill siting" Confused by the above action item, as this draft plan makes reference to the mayor calling for no more everyday landfills, eliminating the need for future landfills. Is this incorrect?	Thank you for your comment. Considering the recent Land Use Commission ruling that gave the City and County of Honolulu until March 2, 2028 to close the landfill, the City is currently evaluating how best to respond to this ruling and if the City were to comply with the Commission's deadline, it would need to begin searching for another site shortly to ensure proper disposal of ash and bypass waste from H-POWER and the less than 10% of solid waste that is currently not able to be reduced, recycled or processed at H-POWER.	Yes. Revised second to last bullet in the Executive Summary and Section 8.3.4.2, and deleted the action items in 7.5 and 12.3.
940	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Landfill	Future Siting	8. Facility Capacity & Siting Recommended Additional Content: "Understanding the existing capacity of this network, <u>reducing the necessity for increased capacity through source reduction</u> , as well as future capacity needs of the City, is both a required element of this Plan, and a crucial element of solid waste planning.	Thank you for your comment. Although the City is hopeful that source reduction will reduce the need for future facility capacity, the City prefers the text as written because it references back to the requirements of the plan.	No.

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941	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Landfill	Future Siting	<p>8.1 Goals and Objectives</p> <p>Recommended addition to last bullet: "Such plans include supporting source reduction measures that would ensure the longevity of existing disposal facilities and reduce the need for additional facility siting, through reduced MSW stream volume."</p>	Thank you for your comment. The Plan text will be revised as recommended.	Yes. Revised Section 8.1 as recommended.
942	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	H-POWER	Fourth Boiler	<p>8.3.2.2 Future Needs</p> <p>Final Paragraph: "While additional H-POWER capacity is not expected to be needed in the next 10 years, the City should continue to assess future needs and plan for future expansion as appropriate, especially considering lengthy development time for major projects. Preliminary long-range planning for future expansion should begin as appropriate during the next ten years. This could include a capacity analysis to identify when and if a future WTE expansion may be required, including the need for the redundancy of a fourth boiler to ensure boiler availability, preliminary discussion of potential sites, and an updated technology review. Because the process for budgeting, contracting, permitting, and constructing a new facility from conception to completion is expected to take approximately 10 years, the City should begin the process as soon as a potential need is identified. It should be noted that the City supports ways to reduce greenhouse gas emissions, including significantly reducing plastics and other fossil-fuel based products from the waste stream over the term of this ISWMP, to reduce the carbon pollution emissions from H-POWER."</p> <p>Comment: This continues to be a frustrating sticking point in this plan. In spite of the City's own analysis confirming that no new facilities will be needed, and economic growth (presumed increase in waste generation that doesn't account for source reduction measures) slated to get nowhere close to reaching the existing capacity far beyond the 10 year scope of this plan, this plan still calls for devoting precious resources and man hours to planning for a fourth boiler. This paragraph completely undermines the commitment to dramatic waste reduction goals and effectively commits us to pursuing this strategy that has numerous alternatives with far more tangible benefits and lower capital and O&M costs.</p> <p>The City claims that there isn't money for constructing and operating co-composting facilities, repair warehouses, rebottling and canning facilities to address upstream waste reduction, but is indicating that the high costs of siting, planning, and permitting (not including multi-millions in construction) is an assumed, covered and acceptable expense.</p>	Thank you for your comment. Regardless of the success of future waste reduction, reuse, and recycling initiatives, the City believes that long-term planning for future disposal capacity is prudent. The City supports waste reduction efforts; the more successful those efforts are, the less processing and disposal capacity will be needed.	No.
943	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	H-POWER	Fourth Boiler	<p>Recommend Additional Content:</p> <p>If nothing else, this paragraph should indicate that the City's top priority is the source reduction measures committed to in this document, and will be pursued aggressively. And, if there is a dramatic increase in generated waste observed in the 10 year scope, that analysis will be done on whether a fourth boiler is even the desired strategy to pursue FIRST before planning begins. The county's citizens have been outspoken about their rejection of expanding to additional boilers and further put or pay contracts, and the construction of a fourth should not be implied as a given in this document.</p>	Thank you for your comment. Please see the response to comment 942.	No.

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944	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Glass	Local Options	8.3.7.2 Future Needs Comment and Recommended Additional Content (Glass Processing) Appreciate the addition of details about the glass RFP in the Glass Processing Facility section. Encourage additional language about the City exploring a rebottling pilot project or facility as a potential for glass reuse, as it is a recognized and preferred strategy over the downcycling of glass. A durable, tempered glass or durable plastic sanitizing and rebottling facility could be a cornerstone solution for on-island source reduction measures and upstream waste reduction. Alternatives to crushing should at least be considered and are worthy of mention here.	Thank you for your comment. Please see the response to comment 735.	No.
945	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Recycled Materials	Mandate	9. Materials Marketing and Procurement 9.3 Existing Programs and Markets Comment: Paragraph 2 Can the City "mandate" instead of "encourage" the use of recycled materials in order to help build a local demand? Otherwise it would not really qualify as building a market, since compliance is voluntary.	Thank you for your comment. Please see the response to comment 738.	No.
946	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Recycling	Sorting	9.3.1 Paper Comment: Paper would be much less contaminated with multi-stream recycling (vs. the single stream we currently use). This would increase the amount of viable product we have to send for recycling and potentially garner a higher price. This section, and the City, should consider a return to multi-stream collection for higher value commodity stock.	Thank you for your comment. There are advantages and disadvantages of single-stream versus multi-stream recycling. Most communities have moved to single stream because the collection costs typically are much less than the added revenue and lower contamination rates from multi-stream. That said, multi-stream recycling is something that could be evaluated in the future though.	No.
947	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Composting	Large-Scale Facility	9.3.6 Other Organics Comment: "Barriers to the markets for materials made from food and biosolids include the declining number of pig farms, more restrictive regulations for compost facilities that process certain types of food, and the limited number of other existing outlets for food waste and biosolids." We would challenge this...lots of local farms looking for high quality compost that could be derived from food waste, as current stocks sold from green waste composting is low quality and lacking in soil nutrition. Quality soil amendments have to be imported, currently, at high costs to farmers. Maybe piggeries are on a decline, but we could adapt and pivot with the times and increase composting throughput by ramping up local-processing capacity (central or regional system). The City is encouraged to acknowledge the co-composting potential of food waste and its high value as a resource. If the City can put forth extensive man hours over the years to lobby the State for burning recyclables, then it is equally reasonable that it would advocate for easing barriers and burdens for large-scale or regional composting centers. This is a high priority for a number of local NGOs, who would gladly work alongside the City to achieve this goal.	Thank you for your comment. Please see the response to comment 728.	Yes.

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948	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	E-Waste	Recycling	<p>9.3.9 Electronic Waste</p> <p>"As of January 1, 2010, consumers can recycle their covered electronic devices through these programs. As of January 1, 2011, consumers may recycle their covered TVs through these programs.351"</p> <p>Comment: Similar critiques listed in Section 4, but if no details are provided in this plan or on the City website as to who operates these take back programs, or how a resident might obtain details, then it there is a large information gap here and for residents seeking answers. Please include details about how residents might get more information or take advantage of the take back programs (here or reference specific information on the website).</p>	Thank you for your comment. Additional details and links have been added to Sections 6.3.2, 6.3.2.1, and 6.3.2.2 in response to comments 919 and 921a.	Yes. Revisions made to Sections 6.3.2, 6.3.2.1, and 6.3.2.2.
949	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Beneficial Reuse of Ash	Health and Safety	<p>Section 9.3.10 Ash</p> <p>Recommended Additional Content: "Current markets for ash are extremely limited, especially with respect to ash produced at H-POWER. However, there is potential for a larger market for the beneficial reuse of ash. Barriers to the market include low acceptance of existing reuse technologies <u>and concerns over negative environmental and public health impacts.</u>"</p>	Thank you for your comment. At this time, the County recognizes these concerns exist, but has not found these concerns to be a limitation on ash re-use.	No.
950	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Markets	Strategies to Promote	<p>9.4.2 Investigate Additional E-Waste Management Practices & 9.4.3 Investigate New Ways to Promote the Procurement of Processed Organics</p> <p>These section are great and appreciated! Thank you for including!</p>	Thank you for your comment.	No.
951	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Energy Balance	Source Reduction and Reuse	<p>Section 10.3 Energy Balance Estimates</p> <p>Comment: This intro paragraph does not factor into the equation the clearly superior energy savings of source reduction and reuse strategies. The comparison of scenarios is highly limited if it only offers landfilling, incineration and recycling for analysis. This comparison is clearly written in such a way that incineration as seen as the best available system, without sufficiently considering any of the significant environmental (and financial) impacts including emissions, ash and residue tonnage, high operations and maintenance costs just to keep the facility going. As is, this section will still pushback from environmental orgs.</p>	Thank you for your comment. The energy balance section is structured to meet the statutory requirements established in the HRS 342G-26 (d). The introduction to Section 10 notes that "...there are greenhouse gas emissions related to H-POWER that would be avoided if waste materials can be reduced at source or recycled on-island."	No.
952	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Energy Balance	Ash and Residue	<p>Section 10.4.3.1 Applicability to Oahu Waste Stream</p> <p>Comment: This section does not include mention of the % of ash and residue left over which is certainly relevant if volume reduction is being discussed.</p>	Thank you for your comment. Ash and residue quantities are shown in Table 8-7 in Section 8.3.4.1, and there is additional discussion about ash in Section 5.3.5.	No.

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953	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	WTE	Local Data	<p>Section 10.4.3.2 Commercial Status</p> <p>Recommended Clarification and Addition: Why does this section only discuss the national context of commercial viability? Please include the relevant production numbers for O'ahu.</p> <p>Recommended Addition and Comment: This section or the next could also include the revenue loss and fees paid without services provided for waste processing incurred by the C&C when tonnage quotas are not met since it has a real financial impact on the City. These fees and lost revenue from energy generation have been stated as a consideration when decisions about diversion to HPOWER are being made.</p>	Thank you for your comment. This section is intended to be a comparison of alternative technologies generally. Specific issues related to H-POWER are covered in Section 8 and elsewhere.	No.
954	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	WTE	Risks	<p>Section 10.4.3.3 Risk Factors</p> <p>Recommended Addition: Please include the operational risk of down time for maintenance due to glass melting on the grates (cited by ENV staff).</p> <p>Recommended Addition: Please include the potential environmental risk associated with burying the ash/residue in the landfill. Additionally, there is no mention of the existing environmental impacts of the emissions from incineration, which are the 5th highest in the state. In addition to the listed "Environmental Risks"...dioxins are also a human/enviro health risk in the ash (not just metals). Please include these references to provide a true, balanced assessment of this technology.</p> <p>Comment and Recommended Addition: This section does not include the financial risk of the fines that the City has been incurring for years because of the Put or Pay contract tonnage minimums. To leave this out would be intentionally misleading to any reader. Please include under financial risks.</p>	Thank you for your comment. Please see the response to comment 953.	No.
955	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Composting	Large-Scale Facility	<p>10.4.4 Municipal Solid Waste Composting & 10.4.4.2 Commercial Status</p> <p>Comment: That MSW composting, in spite of extremely-limited application of end products, is given an entire section and consideration when actual co-composting operations that have extensive environmental and fiscal advantages are not even given consideration in Section 3 or 4 of this plan. This is interpretable as further evidence that the City is not willing to truly consider viable alternatives to diversion of organics from HPOWER, and will continue to receive pushback from the community.</p>	Thank you for your comment.	No.

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956	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	H-POWER	Waste Diversion	<p>Section 10.4.5 Findings from the Assessment</p> <p>Recommended Addition: “Based on the current existing technologies available, WTE (H-POWER) continues to be the most appropriate and cost-effective alternative to landfill disposal because of its level of commercialization, ability to process large throughputs, and ability to manage the larger multi-material MSW waste stream and not just a subset. <u>However, source reduction and reuse strategies committed to in this Plan will still be pursued, in conjunction with HPOWER’s continued operation, to minimize the associated operational, environmental and financial “risks” outlined above.</u></p>	Thank you for your comment. This topic is covered in Section 10.5.	No.
957	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	WTE	Risks	<p>Section 10.5 Summary</p> <p>Comment: This section does not adequately highlight the much more effective, affordable, and impactful strategies of upstream waste reduction and reuse, framing WTE as the only viable option.</p> <p>Recommended Clarification and Addition: In spite of the energy balance scenarios it still remains unclear how landfilling and incineration are being appropriately compared when there is no discussion of emissions. Please make more clear that these comparisons and championing of WTE are being done based primarily on the energy balance, not necessarily taking into account all of the associated operational, environmental, and financial risks. Not to suggest that landfilling is “better,” merely that the discussion is being framed as having to choose between landfilling and incineration when there are other strategies that were not adequately considered in order to make WTE appear as the natural choice given that nearly a billion dollars has already been invested in the infrastructure, and O&M.</p> <p>Comment: This entire chapter reads like a sales pitch for WTE, and does not present the drawbacks honestly and transparently. Please take into account the recommended edits above to present a fair analysis.</p>	Thank you for your comment. The Plan text will be revised to include a statement that recognizes the energy benefits of not generating waste.	Yes. Revised Section 10.5 to mention the energy benefits associated with a reduction in waste generation.
958	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	System Cost Analysis	General	<p>Section 11: Solid Waste System Cost Analysis</p> <p>All previous comments have been resolved. Mahalo.🙏</p>	Thank you for your comment.	No.

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959	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	Strategies	<p>Section 12: Implementation Plan</p> <p>Table 12-1. Honolulu ISWMP Implementation Plan</p> <p>Table Section 3.</p> <p>There is no mention of expanding ordinance on food scraps recycling. Piggeries decreasing, but with composting facilities, this should be a goal of expanding businesses beholden to diversion law.</p> <p>No plans to support repair and reuse facilities and programs?</p> <p>Recommend funding program to solicit RFPs for on-island processing of materials (ex multiple plastic resins) and potential reuse facilities (bottling)</p> <p>Item 6: In addition to procurement, can we include C&C operations (ex. Use a moving service that provides reusable boxes and pickup), internal policies on paper printing minimization, reduction of plastic schwag, etc.</p> <p>Commission reports on feasibility of multi-scale source reduction programs, policies, infrastructure</p>	<p>Thank you for your comment. For food scraps recycling, please see the response to comment 728. For repair and reuse, please see the response to comment 921b. For on-island processing and re-use, the City is issuing a series of RFPs to promote on-island recycling. For C&C and multi-scale programs, C&C currently has a variety of programs that reduce waste: these would be good items for the SRWG to investigate.</p>	No.
960	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Recycling	Strategies	<p>Table Section 4.</p> <p>Item 1: Please include co-composting operations in this list of feasibility studies and consideration since a number of studies globally indicate that building and operating co-composting facilities are 5-7 times cheaper than incineration plants.</p> <p>Bulky Item pickup: Could the increase in bulky item pickup include contracting Services for picking up donation items (Reuse Hawai'i, HHFH Restore, Long term - for a materials repair service.</p> <p>Item 12: A lot of emphasis on ND glass. Include research on processing plastic resins on-island for long term plans of exiting commodities markets</p> <p>Item 15: is commercial abuse a large enough concern to warrant an electronic voucher system that residents can present to identify legitimate loads/drop off? Same Q for Item 22 at WGS.</p> <p>Item 17: Please consider the "expansion" as well as continued enforcement of the food waste ordinance if on-island processing capacity increases (which it will if assisted by City and NGOs :)</p> <p>Item 18: Are there any prospects that can be mentioned here for further manufacturer-managed deposit programs like electronics and batteries expanded to these difficult to manage materials? State or County policy?</p>	<p>Thank you for your comments.</p> <p>Item 1: Please see the response to comment 907.</p> <p>Bulky: This would be a good topic for consideration by the SRWG, since it would require partnering with local reuse organizations.</p> <p>Item 12: The City would like this, but has yet to be presented with a viable option for on-island plastic processing.</p> <p>Item 15: While commercial abuse is a concern, the City does not feel that the costs of an electronic voucher system would outweigh the savings at this time.</p> <p>Item 17: Several options for expanding the food waste ordinance have been identified for consideration by the SRWG.</p> <p>Item 18: Initiatives related to manufacturer take-back programs for electronics are included in Section 6.</p>	No.

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961	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Special Wastes	Strategies	Table Section 5. Item 16 & 17: Another case for an electronic voucher program to curb commercial dumping abuses. Item 18: A new DPP permit classification for deconstruction has been proposed. What is C&C's position on this proposal? Can it be referenced here?	Thank you for your comment. The City is considering the electronic voucher idea; however, it is too early to tell how we will best implement this pay as you throw idea.	No.
962	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	E-Waste	Strategies	Table Section 6. In addition to an ADF for electronics, would recommend a repair facility + classes/workshops on-island, funded by electronics ADF partially.	Thank you for your comment. Please see the response to comment 921b.	No.
963	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Public Education	Strategies	Table Section 7. Item 2: Has the effectiveness and engagement with printed mailers been evaluated? The costs and resource use is high, for potential low-impact. Item 10: If a public education coordinator is being prioritized and budgeted for, shouldn't the target number of presentations increase by a lot more than 1 per year? Please increase this target. Item 17: regarding cart inspections, are fines a consideration to reduce contamination or kuleana of drivers to not pick-up if contaminated? Item 26: In addition to a viewing area, use space to host repair and reuse workshops!	Thank you for your comment. Please see the response to comment 784.	No.
964	Rafael Bergstrom, Executive Director and Nicole Chatterson, Director	Sustainable Coastlines Hawaii (Rafael Bergstrom) and Zero Waste O'ahu (Nicole Chatterson)	email dated 8/27/19	General	General	I am writing on behalf of Zero Waste Oahu (and Director Nicole Chatterson) as well as from my position as ED of Sustainable Coastlines Hawaii and our team to provide comments on the ISWMP for Honolulu County. We deeply appreciate all the time and effort that has gone into this process and for your consideration of all the collective thoughts that have been presented to you. As stated in the attached letter, we are offering comments and, additionally, stand behind the comments of our non-profit partners whose interests have been represented on the advisory board by Kokua Hawaii Foundation. We know that they will represent the interests of our groups well. We have added in emphasis on some key points we find important to the future of waste management.	Thank you for your comment. The City looks forward to the opportunity to continue to work with key stakeholders on innovative waste solutions as part of the SRWG.	No.

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965	Rafael Bergstrom, Executive Director and Nicole Chatterson, Director	Sustainable Coastlines Hawaii (Rafael Bergstrom) and Zero Waste O'ahu (Nicole Chatterson)	email dated 8/27/19	Source Reduction	Goals	<p>Mahalo for the opportunity to submit testimony on the updated Intergraded Solid Waste Management Plan and for the countless hours put into the process over the past 2 years. Your time, efforts, and willingness to help pursue change are important to the sustainable future of this island and beyond. Before adding some thoughts on amendments to the draft plan, we would like to recognize the dialogue from last month's public meeting as being an example of how public discourse can be effective. Our teams and the attendees appreciated the opportunity to give oral testimony, but more importantly to be able to engage in question/answer sessions. This step is very different from a typical council meeting and believe that the public would benefit greatly and have more trust in the decision makers if hearings were more two-way discussions that allowed for greater accountability on both sides of the table.</p> <p>With that all being said, we would like to offer some comments to strengthen the impact of the ISWMP. In addition to the examples that we list below, Zero Waste O'ahu & SCH are supportive of the comments submitted by our non-profit partners and specifically those of Kokua Hawaii Foundation within their role on the advisory board. In the overall goals we appreciate some of the effort on source reduction but believe that we can do better.</p> <ul style="list-style-type: none"> • A commitment to reducing solid waste per capita by 25% by 2030 is admirable, but is reflecting a statistic that would merely bring Oahu's per capita waste down to the national average. While this should be done, it should be noted that the United States, per capita, produces far more waste than any other country in the world. We should not be shooting merely to fall in line with the worst waste producers in the world, rather we should be leading the movement towards a large reduction in waste generation. As an island, we have a higher responsibility to these efforts as an example to the world and to protect our home for future generations. Please consider 50%-80% reductions over the course of the next 10 years. It is not an impossible goal if we innovate and put effort into more of the solutions listed below. 	Thank you for your comments and participation throughout the process. While the City is comfortable with a reduction goal of 25%, we will not stop there and hope that the strategies identified through this Plan and future discussion with the SRWG will result in reductions in exceedance of the goal.	No.
966	Rafael Bergstrom, Executive Director and Nicole Chatterson, Director	Sustainable Coastlines Hawaii (Rafael Bergstrom) and Zero Waste O'ahu (Nicole Chatterson)	email dated 8/27/19	Source Reduction	Single Use Plastics	<ul style="list-style-type: none"> • A 1% reduction in plastic going to H-Power, while a step, is once again not aggressive enough when we consider the growing consequences of allowing plastics to proliferate in our society. The UN plastics report sites evidence that plastics will consume 20% global fossil fuel use just in their production process by 2050 if we continue on our current path. This is not a sustainable behavior and the when considering GHG emissions both from incineration and recent studies from UH Mānoa that illustrate methane release from degrading microplastics in the environment, we need more aggressive recommendations to our council. Further studies are unnecessary – globally single-use plastic phase-outs are underway with little-to-no financial hardship reported. Systems must adapt. 	Thank you for your comment. Please see the response to comment 781.	No.

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967	Rafael Bergstrom, Executive Director and Nicole Chatterson, Director	Sustainable Coastlines Hawaii (Rafael Bergstrom) and Zero Waste O'ahu (Nicole Chatterson)	email dated 8/27/19	H-POWER	Emissions From H-POWER	<ul style="list-style-type: none"> The language that continues to uplift HPOWER throughout this document is troubling when all indications globally is that incineration has immense consequences and is being phased-out of use in light of climate change consequences. There is little to no acknowledgment that waste to energy is a major source of GHG emissions and toxins, or that our current contract requires us to toss 800,000 tons of trash per year. H-POWER produces 2 times the greenhouse gas per MWH of energy as Kahe, O'ahu's largest oil based energy plant. Ultimately this system in its current form is a perpetuation of existing and detrimental waste discussions. 	Thank you for your comment. The City believes that H-POWER's role in the waste management system is presented in an accurate, reasonable manner. Please also see the response to comment 1030.	No.
968	Rafael Bergstrom, Executive Director and Nicole Chatterson, Director	Sustainable Coastlines Hawaii (Rafael Bergstrom) and Zero Waste O'ahu (Nicole Chatterson)	email dated 8/27/19	County Tourist Tax	\$1	<p>In Section 3 on Source Reduction and Section 4 on Recycling & Bioconversion we would like to see recommendations that push our city to be more innovative, think with a sustainable future in mind, and put more tangible steps into place.</p> <ul style="list-style-type: none"> Tourist Waste Plan: A \$1 fee should be applied to each visitor to subsidize the burden of dealing with visitor industry trash and allow Honolulu to pursue waste reduction. While our population continues to produce too much waste, it is important to acknowledge the large impact of a transient visitor population that persists on this island. With proper education and outreach we believe almost all visitors would happily contribute to a fund that helps push waste innovation. A simple \$1 fee would generate millions each year and provide the foundation for funding an education position, working on micro-grid demonstration products in composting and glass re-use, and allow for flexibility in creating further innovative projects. 	Thank you for your comment. Please see the response to comment 732.	Yes.
969	Rafael Bergstrom, Executive Director and Nicole Chatterson, Director	Sustainable Coastlines Hawaii (Rafael Bergstrom) and Zero Waste O'ahu (Nicole Chatterson)	email dated 8/27/19	Source Reduction	SRWG	<ul style="list-style-type: none"> Source Reduction Working Group: Given the extensive knowledge and expertise within our organizations we request that ZWO and SCH would both have seats on the working group. Our teams have put countless hours into studying these issues and would like to contribute to creating a healthier future for our islands. 	Thank you for your comment. The members of the SRWG have been established. For now the City would like to keep it as is to ensure an even voting membership between government, environmental groups, and business. Meetings will be open to the public and the City would welcome ideas and contributions from others not on the committee.	No.

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970	Rafael Bergstrom, Executive Director and Nicole Chattersson, Director	Sustainable Coastlines Hawaii (Rafael Bergstrom) and Zero Waste O'ahu (Nicole Chattersson)	email dated 8/27/19	Composting	General	<ul style="list-style-type: none"> Composting: This plan ignores composting as a great climate change mitigator, soil health solution, and waste reduction mechanism that stands out as one of the most effective means towards a sustainable economy. This plan should recommend funding micro-grid composting projects and push our city leaders to think creatively on the topic. The plan gives lip-service to cost-benefit, but provides little to no evidence that composting is not a viable option. There is no mention of how much farmers and residents spend on imported compost and fertilizers, nothing on the ecological systems benefits to regenerating healthy soils, and is disappointing in providing any evidence that innovative ideas were even sought out. We cannot look simply at composting from a capitalistic perspective of return on investment from a solely monetary lens. In a world of climate change and quickly eroding soils that damage our reefs we need to look beyond monetary benefits and think with a healthy future in mind. We know that the city can be creative in finding funding. Non-profits are required to do it all the time and there are federal and private funding opportunities for cities to look into. The tourist fee discussed above could also add to this pool. A micro-grid system that works with local organic and commercial farmers is a cost effective and meaningful way to begin to change how we work with organic materials after disposal. O'ahu is still not completely paved over and has immense agriculture space to look into systems that could handle regional loads of residential and commercial food waste. SCH has already begun working with a company in Washington called Green Mountain Technologies. These systems carry so much less of the infrastructure cost that the city would like to avoid and provides for nimble, fast moving, and pest-free systems. 	Thank you for your comment. Please see the response to comment 728.	Yes.
971	Rafael Bergstrom, Executive Director and Nicole Chattersson, Director	Sustainable Coastlines Hawaii (Rafael Bergstrom) and Zero Waste O'ahu (Nicole Chattersson)	email dated 8/27/19	Glass	Local Options	<ul style="list-style-type: none"> Glass & Reuse: Our city and county need to pursue local glass sanitation and rebottling—shipping glass to be recycled is GHG intensive and reusing bottles prevents emissions from the recycling process. Again, this plan does little to think about solutions outside of the box that we have trapped ourselves in already. Honolulu should look to places like Oregon that are implementing pilot programs in coordination with breweries to rebottle, rather than recycle or dispose. Commercial and Industrial washers can be purchased for as little as \$100,000-150,000 and can serve the needs of the size of events at Aloha Stadium in one day. Again, thinking regionally around the island with micro-grid innovation will save the city millions on infrastructure costs. Smaller systems can also be tested for effectiveness with communities before being expanded upon. Ultimately this can be extended beyond just glass and include reusable take out programs (Like GoBox PDX) that would eliminate the need for disposable food-service ware. 	Thank you for your comment. Please see the response to comment 735.	No.

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972	Rafael Bergstrom, Executive Director and Nicole Chatterson, Director	Sustainable Coastlines Hawaii (Rafael Bergstrom) and Zero Waste O'ahu (Nicole Chatterson)	email dated 8/27/19	Public Education	Coordinator Position	<ul style="list-style-type: none"> Education & Action: Ultimately, our organizations believe that this plan is not strong enough on actionable ways to reduce waste (like waste reduction policies). The plan needs a firm commitment to bringing on a waste reduction education specialist rather than just a discussion of the possibility. While our non-profits are doing heavy lifting with educating the public, we need a cohesive partner in the city that understands internal systems and has the ability to disseminate information to the public in meaningful ways that explain how the city is innovating. Please consider stronger language for the creation of this position and put emphasis on the need for a highly skilled educator who is adept in modern technological influence. 	Thank you for your comment. Please see the response to comment 731.	No.
973	Rafael Bergstrom, Executive Director and Nicole Chatterson, Director	Sustainable Coastlines Hawaii (Rafael Bergstrom) and Zero Waste O'ahu (Nicole Chatterson)	email dated 8/27/19	General	General	ZWO and SCH are grateful for the opportunity to provide comments on HCC ISWMP and are optimistic that our community can move towards a far more sustainable future in regards to waste. We hope that our comments and those submitted by our non-profit partners are integrated in ways that will push our city and county towards more innovative thinking. We appreciate that this process has brought out far more language about source reduction but caution that the language of the plan is still far too reliant on polluting technology in the form of waste-to-energy. Please email or phone with any questions that you might have and know that we are here to help make our island home a better place. Mahalo for all of your time and consideration. It has been an eye-opening experience to be a part of creating this plan and seeing the complexity that these issues bring.	Thank you for your comment. Please see the response to comment 793a.	No.
974	Quinn Vittum, Executive Director	Re-use Hawai'i	email dated 8/27/19	C&D Debris	General	Thank you for all your hard work and diligence as you've worked on our community's integrated solid waste management plan (ISWMP). Re-use Hawai'i is a non-profit organization working to keep building materials out of the landfill and provides them to the community as an affordable resource. This ISWMP is a crucial step to help Hawai'i become more sustainable, self-reliant and resilient. Construction and Demolition waste is the one of the largest contributors to our waste stream in Hawai'i, representing 15-30% of all the material going into the landfill. On Oahu alone, over 400 structures are demolished each year. Only 10% of these are deconstructed and salvaged for reuse.	Thank you for your comment. The City supports reuse of building materials over disposal.	No.
975	Quinn Vittum, Executive Director	Re-use Hawai'i	email dated 8/27/19	Source Reduction	C&D Debris	<p>Furthermore, the production of building materials consumes a tremendous amount of energy. When these items are kept out of the landfill and preserved for reuse, all the energy that was invested into them is also saved. For every ton of wood products that are salvaged in Hawai'i, 60 pounds of greenhouse gases are prevented by reducing the need to harvest and produce new products.</p> <p>These salvaged materials also become an affordable community resource that helps Hawai'i families, especially those that can't afford to buy new materials.</p> <p>For 12 years Re-use Hawai'i has diverted 11 million pounds of good reusable materials valued at more than 8 millions dollars from the waste stream. We envision a future where natural resources are more broadly preserved by the construction industry in Hawai'i, and the community benefits from the availability of locally sourced affordable building material.</p>	Thank you for your comment. The City supports reuse of building materials over disposal.	No.

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976	Quinn Vittum, Executive Director	Re-use Hawai'i	email dated 8/27/19	Source Reduction	SRWG	We strongly support the creation of a "source reduction working group" to explore the best solutions to our waste challenges. Re-use Hawai'i would be very willing to participate.	Thank you for your comment. Please see the response to comment 969.	No.
977	Quinn Vittum, Executive Director	Re-use Hawai'i	email dated 8/27/19	Public Education	C&D Debris	We would also be happy to help with any ongoing or future public education initiatives.	Thank you - the City will keep this generous offer in mind moving forward.	No.
978	Quinn Vittum, Executive Director	Re-use Hawai'i	email dated 8/27/19	Recycling	C&D Debris	We would like to call attention to PVT Landfill's claims that they are diverting material from the landfill. Our understanding, having spoken with Steve Joseph from PVT Land Company, is that they are picking out wood waste and putting it in a dedicated landfill cell in the hopes that they will be a future use for it. So far and after six years of searching, they have not found a partner that is willing or able to use the waste. Therefore, PVT's claims of waste reduction and recycling are false and misleading to the public and the industry that uses the landfill. This also skews the understanding of C&D waste challenges. Though, your studies indicate that C&D is only 15% of our community's waste stream, in actuality, there's much more being landfilled in these dedicated landfill cells.	Thank you for your comment.	No.
979	Quinn Vittum, Executive Director	Re-use Hawai'i	email dated 8/27/19	Recycling	C&D Debris	In section: "4.3.12 C&D Debris" please double check your list of recycling outfits. For example, Tajiri Lumber is no longer in operation.	Thank you for your comment. We will note this change; however, it is expected that the recycling business and participants will change over time.	Yes. Revised Section 4.3.12 to remove Tajiri Lumber. All other businesses and organizations listed
980	David Atcheson		email dated 8/27/19	Food Waste	Composting	<p>Thank you for this opportunity to comment on the 2019 Integrated Honolulu Solid Waste Management Plan (ISWMP) Update. I appreciate many aspects of the planning and process.</p> <p>One of the biggest surprises to me about the document is the lack of a plan for composting food waste from residents. I live in a 40-story condo tower and often consider the big picture of the organic waste stream that flows from our building on a daily basis. What a huge waste of all the embodied energy and nutrients in that food waste! What could be captured and turned into a valuable soil amendment to assist with our island and state's food production goals instead becomes a liability that is expensive to haul and can inhibit hot burning at H-POWER.</p> <p>I am fortunate to have a plot at a nearby community garden at which I keep a worm bin. This, combined with our largely plant-based diet, allows my household to compost the vast majority of our food waste into organic fertilizer for the garden plot. Most people do not have that option, so down the garbage chute it goes.</p>	Thank you for your comment. Please see the response to comment 728.	Yes.
981	David Atcheson		email dated 8/27/19	Food Waste	Vermiculture	I was surprised not to find a single instance of the word "worm," "vermicompost," or "bokashi" in the ISWMP document. The closest that I see the document gets to addressing residential food waste is education campaigns to help people more efficiently utilize the food they buy and thus have to throw out less. Our household is very efficient in that regard, yet I am surprised by the volume of peels, cores, coffee grounds that we generate.	Thank you for your comment. The benefits of vermiculture and bokashi are presented in the City's backyard composting workshops.	No.

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982	David Atcheson		email dated 8/27/19	Food Waste	Composting	Please use this plan update to explore the possibilities of 1) municipal food waste composting and 2) extending requirements for food waste handling to small businesses, institutions, and residents. (I am an active member of a large temple -- if we were required to manage and not throw out our food waste, we would find a way to do it!) If a whole new collection program were not possible in the near term, maybe we can incentivize entrepreneurship to address the food waste collection challenges. Small businesses could offer one or more of a suite of options -- weekly bokashi bucket swap, onsite bio digesters for institutions, wormery programs in conjunction with the community gardens, etc. A request for proposals may reveal many creative solutions.	Thank you for your comment. Please see the response to comment 728.	Yes.
983	David Atcheson		email dated 8/27/19	Glass	Local Options	On a different topic, I would like to encourage more consideration be given to re-use. Glass bottles, for instance, are a real conundrum in my building. The building offers only Hi5 recycling. Even so, bottles Hi5 and not are tossed in and frequently break. Let's go back to reusing bottles with a return-and-wash program wherever possible. Where not possible, let's process them here into sand for our beaches or an additive for roadbuilding or other construction uses.	Thank you for your comment. Please see the response to comment 735.	No.
984	David Atcheson		email dated 8/27/19	Source Reduction	BYO Take-Out Containers	Another re-use project pertains to restaurant food containers. It should be commonplace to bring in our own containers when we know we would otherwise be served food in single-use vessels. Let's work out any issues with health regulations that might get in the way of "bring your own." Thank you for considering my comments. Again, I hope the plan will address how we can capture that hugely valuable food waste stream from residential properties.	Thank you for your comment. Please see the response to comment 726.	No.
985	Stuart H. Coleman, Hawaii Manager	Surfrider Foundation	email dated 8/27/19	H-POWER	Emissions From H-POWER	As the Hawaii Regional Manager of the Surfrider Foundation, I am writing in strong opposition to any future plans that would "divert recyclable materials to H-Power" or build out a fourth boiler for Covanta's H-Power Plant. We have pushed for the development of on-island recycling and upcycling facilities on Oahu for years, and we cannot support diverting recyclable materials to H-Power, even for a short period; nor can we support any expansion of or additions to H-Power. We understand that the City & County of Honolulu's contract with Covanta has locked the City into a trash quota and that the Auditor's Report was critical of this flawed contract. We understand that the current global recycling market is struggling after China began refusing to accept the plastic waste from other countries and that this is causing a disruption of the recycling market. But H-Power is not the solution—indeed, it is a big part of the problem. The H-Power plant produces 2-3 times more greenhouse gases than our largest oil-burning power plant on Oahu. It is also listed as one of the top 5 sources of particulate matter and dioxins in the County. Incinerating our recyclables is no way a form of recycling but instead a form of pollution.	Thank you for your comment. Please see the responses to comments 906 and 967.	No.

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986	Stuart H. Coleman, Hawaii Manager	Surfrider Foundation	email dated 8/27/19	Source Reduction	Single Use Plastics	I don't think the current ISWMP effectively addresses the key role of waste reduction, which is a much less expensive and more effective strategy of dealing with our recycling issue. After working with many of you, we successfully passed bills to reduce single-use plastic bags. Now, we are trying to do the same with other toxic and widely littered single use plastics like polystyrene foam (one of the most littered, toxic and least recycled forms of plastic ever made)	Thank you for your comment. The City supports the reduction of single-use plastics and aims to work with other stakeholders to identify future reduction strategies as part of the SRWG. Additionally, the City will be represented within the State Plastic Source Reduction Working Group and looks forward to working with other group members to develop state-wide solutions. The first meeting of the State Plastic Source Reduction Working Group is scheduled for November 14, 2019.	No.
987	Stuart H. Coleman, Hawaii Manager	Surfrider Foundation	email dated 8/27/19	H-POWER	Burning Recyclables	After decades of educating the public about the importance of recycling, sorting and preparing curbside pickup, it would be a dramatic turnaround and betrayal of public trust to start burning recyclables at H-Power. A dedicated waste reduction policy would better serve the interests of the people of Honolulu. Surfrider and other groups advocate a policy of "1, 2, C," meaning that we focus on recycling the most valuable plastics (#'s 1 & 2), create Composting facilities for all compostable products and reduce all other forms of single-use plastics (#'s 3-7, which have very low rates of recycling).	Thank you for your comment. Please see the response to comment 906.	No.
988	Stuart H. Coleman, Hawaii Manager	Surfrider Foundation	email dated 8/27/19	Food Waste	Composting	For years, we have advocated for statewide bills to reduce and gradually eliminate food waste going to landfills (about 25-30%). To do this, the County needs to increase the amount of composting facilities in each county. Composting will create more jobs and help reduce dangerous Greenhouse Gas (GHG) emissions like methane from rotting food, while also serving as an effective carbon sink.	Thank you for your comment. Please see the response to comment 728.	Yes.
989	Stuart H. Coleman, Hawaii Manager	Surfrider Foundation	email dated 8/27/19	Composting	General	Along with providing guidelines to reduce unnecessary food waste, we hope the ISWMP will work to incentivize the growth of more composting facilities in the county and generate more green jobs at facilities that produce valuable soil and benefit local agriculture. We hope to follow the model of successful bills recently passed in California, Connecticut, Massachusetts and Vermont that have reduced food waste and GHG's.	Thank you for your comment. Please see the response to comment 728.	Yes.
990	Stuart H. Coleman, Hawaii Manager	Surfrider Foundation	email dated 8/27/19	H-POWER	Emissions From H-POWER	Finally, leaders from Surfrider, Kokua Hawaii Foundation, Zero Waste Oahu and other groups volunteered their time and expertise for over a year in planning meetings for the C&C of Honolulu's Integrated Solid Waste Management Plan (ISWMP). They adamantly opposed any expansion of H-Power, but recent resolutions have tried to pre-empt and ignore the discussions from the ISWMP update and push for the temporary incineration of recyclables. Burning our food waste is inefficient; burning our plastic recycling produces massive amounts of toxic ash that pollutes our air, water and soil; and the cycle poses serious human and environmental hazards. We cannot keep expanding on what is widely considered a broken system and expensive system, especially when there are more effective & affordable solutions.	Thank you for your comment. Please see the responses to comments 906 and 967.	No.

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991	Stuart H. Coleman, Hawaii Manager	Surfrider Foundation	email dated 8/27/19	Recycling	Long-Term Solutions	If we start planning now, we can build out a long-term solution for our recycling system that focuses on eliminating single-use plastics, recycling the most valuable plastics and upcycling those into useful products that can be used on island. Please let us know if you have any questions or concerns and let us know if you need more input on the C&C's ISWMP. Mahalo for carefully considering this important issue and for not undoing decades of recycling practices.	Thank you for your comment.	No.
992	Miranda Gallegos		email dated 8/27/19	Source Reduction	General	<p>I would like to thank you for the opportunity to submit testimony with comments on the 2019 Integrated Solid Waste Management Plan</p> <p>The current state of the 2019 Integrated Solid Waste Management Plan (ISWMP) holds high aspirations, goals, and objectives for all levels of stakeholders involved to improve the waste management system in the City and County of Honolulu. The plan not only outlines Hawaii's statewide sustainability goals, but cites accountability in comparison to the Aloha Plus challenge and the Paris climate agreements. The ISWMP cites the main goal as source reduction.</p> <p>As I am sure many other testimonies have pointed out, the majority of the source reduction actions within the plan hinge on education. Within the EPA 2018 plan, source reduction is defined as the "result from any activity that reduces the amount of a material or agricultural input needed and therefore used to make products or food." Therefore, it is a complete reduction in consumption of raw materials used to produce goods, simultaneously the voluntary consumption of goods and services which consume the raw or final products.</p>	Thank you for your comment. The City agrees that source reduction is critical for waste management on Oahu.	No.
993	Miranda Gallegos		email dated 8/27/19	Source Reduction	General	I believe there are many localized ways to solve industrial problems. I also believe that it requires place based initiatives. We are living on an island where 80-90% of all goods are imported. During a time of natural disasters or food storage, Oahu would experience significant scarcity of subsistence resources. What once was completely sustainable from mauka to makai, now depends on import orientation for basic subsistence. Due to this orientation, more waste is brought onto the island than can be commercially and compostably processed. Source reduction does not mean burning existing materials, adding on an additional burner, nor increasing recycling facilities on island. Although the latter would reap many benefits.	Thank you for your comment. Please see the response to comment 992.	No.

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994	Miranda Gallegos		email dated 8/27/19	Public Education	Source Reduction	Just like any issue, we cannot solve what we cannot see. We must begin with education and awareness. Consumption comes with a price that is not paid for by producers nor consumers within the global economic system but in the growing amount of waste, ecological deviation, pollution, toxic waste and climate change as we know it. The system we have created relies on responsibility of the producer and consumer to make conscious decisions and act responsibly with post consumer materials. However, a majority of the time this is not the case. Simply look at the recycling industry where 91% of materials do not make it to recycling facilities. Then of those that do, 60% are then thrown out due to improper recycling, such as being put in a plastic bag and contamination, having food residue still inside. It is our everyday responsibility to educate ourselves about our consumer choices and the impact they hold, yet 1 in 10 recyclable products makes it there. A dedicated state position concerning the education of the community to make our kuleana more visible and increase community awareness of the issue and solutions is the first step to source reduction.	Thank you for your comment. Please see the response to comment 786.	No.
995	Miranda Gallegos		email dated 8/27/19	Public Education	Coordinator Position	We must educate our community about their kuleana. One large way that can begin is by directly appointing someone to do it. How can our island community and visitors begin solving an issue is they are not even aware of the issue in the first place? It is up to the city to actualize a position and create visible and tangible public resources for education.	Thank you for your comment. Please see the response to comment 731.	No.
996	Miranda Gallegos		email dated 8/27/19	Public Education	Coordinator Position	A second way would be to increase visibility of reuse organizations. Notably, more so than simply promoting organizations and services on the cities website. A dedicated position to educate the general public on source reduction would directly impact waste management by bringing awareness to other solutions. Some may be a personal voluntary reduction of resources, promoting the Good Samaritan Act to businesses to reduce food waste, and educating the community on localized initiatives for community composting initiatives.	Thank you for your comment. Please see the response to comment 731.	No.
997	Miranda Gallegos		email dated 8/27/19	Source Reduction	Composting	On a related note, a third means of source reduction would be to fund local community composting through pilot project grants. While an industrial food waste composting facility would be ideal, localized initiatives promote public involvement and education, build community, while also tackling the 30% of MSW that is food scraps, diverting it from incinerator to soil fertility and health. Thank you for the opportunity to submit testimony.	Thank you for your comment. These initiatives have been identified for further consideration by the SRWG.	No.

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998	Danny Powell		email dated 8/27/19	Food Waste	Composting	<p>I am writing to provide feedback on the solid waste management system. Having a city or island wide foodwaste program would be significantly beneficial for the community. This program would lower the islands greenhouse gas emissions making us a more sustainable island. This would also lead to a source of organic fertilizer that can be resold to the public or to agriculture, creating revenue for the state. Reducing foodwaste and other organic waste helps us by lessening our effects on the environment, producing fertilizers, and efficient waste management. A program like this one could also be the source of good jobs for local people, helping our economy.</p> <p>Today, the average American trash can is filled with 40% organic waste. This waste ends up in landfills and turn to methane which is 34 times more powerful than CO2. Hawaii's holds a unique spot in the worlds geopolitics. Let us be an example of what sustainability looks like. Many cities are far ahead of us on this issue. in 2009 San Francisco passed an ordinance that makes composting the city's food waste mandatory. Seattle monitors curbside bins and now tags and fines those who violate its composting requirement. Copenhagen, Denmark, has not sent organic waste to landfill in more than 25 years.</p> <p>Investing in an island wide compost program has far more pros than cons, it is clearly a step towards progress.</p>	Thank you for your comment. Please see the response to comment 728.	Yes.
999	Sarah Daigle	SuperNova Energetics	email dated 8/27/19	Public Engagement	SRWG	<p>Thank you for being willing to listen to the community's ideas and proposals for possible additions and adjustments to this next 10 year program that you have placed so much time, thought and effort into! I appreciate your service to this island and it's communities. It is an important one.</p> <p>I do not claim to know everything! So please excuse me if I state something incorrectly. I am just sharing what I feel will help based on what I know. I realized after I wrote this that the majority of my testimony consists of holding people (of all levels) accountable. We need a more cohesive, all-inclusive process to help you and the island deal with it's trash and reduction process. I have no idea what it would take for some of my ideas/proposals to come into play, but they have been running through my mind so I needed to share them! I would really appreciate your feedback if you ever have the time - maybe in the community group you have said will be available to work on reduction plans/projects!?</p>	Thank you for your comment. The City looks forward to the opportunity to continue to work with key stakeholders on innovative waste solutions as part of the SRWG.	No.

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1000	Sarah Daigle	SuperNova Energetics	email dated 8/27/19	Composting	Green Waste	<p>Composting & Other Components</p> <p>In the slide show / report at the beginning of the meeting, you showed that a very large portion of the trash is "green waste". I asked the question "what is considered green waste" and one of you replied that it was plants/green waste, as well as things like carpets and went further to explain that things like carpets are mostly carbon based and therefore are put in the green waste category.</p> <p>I feel this analyzation of the refuse could use some deeper and more precise research, dissection and categorization. My reason being:</p> <p>1) Compost was a Very large topic of conversation at the meeting. I'm not an expert, however, it is a proven fact that composting can improve soil (which we need for health/food production), can reduce run-off and take that "green" waste out of the normal collection/refuse.</p> <p>Having proper % breakdowns to show how much actual compostable green waste is in the system is important, so that as we move forward with possible community composting processes we can measure reduction/progress.</p>	<p>Thank you for your comment. In the waste composition study that was the basis for the figures shown in the presentation, green waste is defined as: "Plant material including leaves, grass clippings, plants, seaweed, prunings, shrubs, branches, and stumps (less than 4 inches in diameter)." It does not include carpets - carpets are in the broad category of "organics", but are not part of green waste. We apologize for this error and for any confusion it may have caused.</p>	No.
1001	Sarah Daigle	SuperNova Energetics	email dated 8/27/19	Composting	Green Waste	<p>2) I understand that a lot of carpets are carbon-based, as well as other textiles and different items, however, a lot of those are made with toxic processes/other ingredients and take a completely different process than actual plants do, which can be broken down for our gardens/yards/etc with composting. In all actuality, maybe the compost items shouldn't be labeled trash at all, but until we get composting processes on a roll on island and educate people (which may take a while obviously!), I feel it would be beneficial for it to be recognized that these are different refuse items and very different categories when it comes to the process of elimination/reduction.</p>	<p>Thank you for your comment. Please see the response to comment 1000.</p>	No.

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1002	Sarah Daigle	SuperNova Energetics	email dated 8/27/19	Composting	Small-Scale	<p>At this point I will say that I am 100% for smaller community composting systems with educational systems put in place. I feel this is an amazing opportunity to encourage Oahu residents to get back in tune with the land, to learn what composting is, it's benefits and help them to see/learn the process while making it as easy as possible.</p> <p>I really like the statistics on composting put out by Smart Assets that I found. They also share a great idea about "Compost Cabs" that work as part of a program to collect organic compostable waste. Apparently the members pay for this service. Twice a year the members get a share of the soil.</p> <p>"According to the Compost Council, about 200 U.S. communities have curbside food waste collection. Over 2.55 million households across 18 states are served by curbside food scrap collection programs. Between 2007 and 2012, the number of households served by curbside compost collection grew by 239%. If you're lucky enough to live in one of these communities you won't have to compost your own food waste or haul it to a local composting site.</p> <p>Some people who can't or don't want to compost their own scraps are willing to pay to give those food scraps away. The D.C. area's "Compost Cab" will drive to your house and collect your compostable organic waste – for \$32 per month. Included in that price are the start-up costs. The company gives new customers a composting kit that includes a collection bin, a compostable liner and a composting guide. Twice a year, customers get a share of the soil created from all that waste."</p> <p>(https://smartasset.com/mortgage/the-economics-of-composting)</p>	Thank you for your comment. We will forward these suggestions to the SRWG for consideration.	No.

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1003	Sarah Daigle	SuperNova Energetics	email dated 8/27/19	Recycling	Commercial	<p>Hotels / Resorts - Recycling & Refuse</p> <p>in 2009-2010 I worked at the Sheraton Waikiki and was part of helping to create the new recycling program, especially through the restaurants. (I wasn't a manager, just a very passionate employee volunteering my time, assistance and knowledge). It was a struggle to get people on board and to even care about a new way of doing things. And because the management wasn't 100% on board with the movement, it was a challenge to get them to hold people accountable.</p> <p>A big thing that I realized is people have to know "why" they are doing something. If they are just told to do something, leaving them questioning why they can't just keep throwing things away in the trash as they always have, chances are they aren't going to change. If they are shown the bigger picture, how all of this trash affects them, their children and their family personally, they may begin to connect themselves to being part of a solution and feel good about learning and making the changes. We have to be transparent and real about what is going on - that the trash doesn't just disappear once it is out of their sight.</p> <p>I have heard over the years that many of the resorts have 'recycling' bins for the public to recycle, and then the employees just throw it all in the trash. This is unacceptable and deceiving. I have heard it is sometimes because the employees don't care and other times because there isn't actually a proper place to put the recycling collection.</p>	Thank you for your comment. The City is working to hire a Public Education Coordinator to better engage the public regarding the importance of recycling.	No.
1004	Sarah Daigle	SuperNova Energetics	email dated 8/27/19	Commercial Refuse Tax	Hotels	<p>Another thing: The majority of Hotels / Resorts on island are not owned by people, businesses or investors from Hawaii. They are owned from people outside the islands, capitalizing on the island bringing more 'things' - furniture, endless office supplies, technology, etc. - and tourists into their buildings while they get to take their money back to their home, wherever that is.</p> <p>What about holding them accountable for their trash production? I'm not exactly sure what that would look like. Maybe an extra tax? I know this would be a process in getting something like this written up and approved, yet it is possible. Having these larger corporations paying an extra fee would not only bring in more money to help with sustaining the refuse production, but it may also begin to hold them more accountable. If an offer was made that if they bring in a certain amount of recycling, then maybe they get a discount on the refuse tax.</p> <p>I just found this. Mayor Caldwell is already looking at charging people for trash. Yet it doesn't mention anything about hotels trash. His proposal does mention an additional tax altogether for hotels. I feel that someone could lock into those extra taxes for Refuse/Education purposes. If he is going to push for charging people for trash, there has to be education AND moderating for recycling purposes so that people don't start throwing everything in the recycling bins. ?</p> <p>https://www.hawaiinewsnow.com/2019/03/02/if-you-own-hotel-an-investment-home-or-trash-can-mayor-wants-charge-you-more/</p>	Thank you for your comment. Commercial facilities are already responsible for paying to dispose of refuse they generate via independent contracts with private waste haulers. The City supports pay-as-you-throw (PAYT) programs as a means to encourage source reduction and recycling, and agrees that public education will be critical to the success of any PAYT program implemented.	No.

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1005	Sarah Daigle	SuperNova Energetics	email dated 8/27/19	Military	Refuse Disposal	<p>Military Bases</p> <p>I have a similar point to make about the military. Hawaii is the largest military state in the US, with that come a lot of people and a lot of refuse.</p> <p>I mentioned this in the meeting, wondering if military bases use our county refuse services. The person who answered my question didn't seem absolutely sure when he replied saying that he was pretty sure that they have their own disposal services.</p> <p>1) Does this mean they ship ALL of their refuse off island? Or just some of it? They still haven't cleaned up their messes on Molokai, so who's to say they are truly disposing of their refuse properly on the 80,000+ acres the Military controls here on Oahu? What I am suggesting is some sort of analysis to be sure they are in deed dealing with their refuse properly, and if not, the City & County Refuse Division deserves extra compensation for their services.</p>	<p>Thank you for your comment. Military bases are not served by the City's refuse collection trucks. Private haulers are contracted by the military to pick up refuse and take it either to on-base landfills or City disposal sites, where they must pay the tip fee. The City has no authority over waste disposal activities occurring on military bases.</p>	No.
1006	Sarah Daigle	SuperNova Energetics	email dated 8/27/19	Military	Refuse Disposal	<p>2) Something that we didn't discuss is: What about the 45,000+ military personnel they re-locate to these islands? (The number I just listed I found online and most likely isn't current.) Oahu County didn't ask for the highest amount of military personnel to be stationed here, yet here they are. Living outside of the bases, shipping container upon shipping container shipped over with their belongings, their vehicles, plus all the other waste that many humans produces. I suggest that there be an extra tax/fee for every person (including each family member that comes with) that is stationed here from outside the islands. Again, we have to start holding people accountable. I know the military is a big one, but that is exactly why they need to be held accountable. With the amounts of monies they have flowing through, they can spare a little more to compensate the county for collection/processing of their waste they produce. (Site with some information on numbers of military in Hawaii/on Oahu - http://fluoridealert.org/wp-content/uploads/hawaii-military-presence.pdf)</p>	<p>Thank you for your comment. Any additional taxes or fees would need to be enacted into law by the State Legislature; however, this is something the City would be interested in considering.</p>	No.
1007	Sarah Daigle	SuperNova Energetics	email dated 8/27/19	Landfill	Waste Reduction	<p>Landfill</p> <p>Part of the meeting discussion talked about reducing the amount of trash going into the landfill if it could be avoided, while also removing items from there that can be burned. I found this article in my research and wanted to see if this might be a viable option for helping to</p> <p><u>Mushrooms that eat plastic may clean our landfills</u> (please see email for the link to the site)</p>	<p>Thank you for the article. The City will review it and take its findings into consideration moving forward.</p>	No.

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1008	Sarah Daigle	SuperNova Energetics	email dated 8/27/19	Source Reduction	Local Gardens and Composting	<p>Teaching & Encouraging people to create their own home gardens / community gardens can reduce refuse!</p> <p>We live on and island where 90+% of our food is shipped in - lots of carbon emissions, and also Lots of packaging waste!</p> <p>"By growing your own food, you are helping to reduce the high amounts of burning fossil fuels that fill our environment as a direct result of importing foods from commercial farmers. You also are reducing waste from food packaging materials such as man-made plastics and cardboard, that also travel hundreds and thousands of miles." (https://www.trianglepest.com/blog/what-are-environmental-benefits-growing-your-own-food)</p> <p>**There aren't many (if any) comprehensive studies showing the effects of how local gardening & composting can reduce overall refuse.</p> <p>Proposal: This is a great opportunity to be one of the first to show/prove results. Set up 2 different types of studies.</p> <p>1) Have a dedicated community location participate in growing their own garden to produce some of their own food. Measure their trash and green waste beforehand, then measure again throughout the study to see how much the levels of refuse change.</p> <p>2) Have a dedicated community location participate in composting their food scraps and green waste. Measure their trash and green waste beforehand, then measure again throughout the study to see how much the levels of refuse change.</p> <p>3) Have a dedicated community location participate in BOTH growing their own food AND composting. Measure their trash and green waste beforehand, then measure again throughout the study to see how much the levels of refuse change.</p> <p>The results from these tests could better show the county, and the world, how these community changes can effect the whole town/city/island/state/world. If the tests show positive results, this could essentially help to align the refuse department with more funds for education and training purposes for the island.</p>	Thank you for your comment. The City supports source reduction and has included a number of strategies for reducing waste in the Plan.	No.
1009	Sarah Daigle	SuperNova Energetics	email dated 8/27/19	Recycling	Residential Collection	<p>Recycling</p> <p>I do not agree with reducing the amount of recycling pickups. I feel Doorae had a really great point in the meeting, that there really needs to be another test done before reducing the amount of pickups. A test that shows us if people really do not have that much recycling and the reduction of pickups is still necessary, or will it show us that people simply need extra education/training on what exactly is recycling. Looking for:</p> <p>1) How full/empty recycling bins are upon pickup & deciphering how much of it is trash, how much of it is recycling</p> <p>2) How full/empty trash bins are upon pickup & deciphering how much of it is trash, how much of it is recycling</p> <p>I know this was a lot. Mahalo nui for reading/listening and considering these possibilities. Whether they can be integrated/applied with this plan, or possibly over time, I hope they added some additional perspectives, ideas and information for you all! Thank you again for all that you do!</p>	Thank you for your comment. The City hopes that efforts to replace all 64-gallon blue carts with 96-gallon blue carts and provide additional blue carts upon request will allow residents to continue to ramp up recycling efforts as education increases. Additionally, the City agrees that proper sorting is essential, and performs inspections of carts and issues reminders or error notices if contamination is found. Requests for additional gray carts are denied if the existing gray carts are found to contain recyclables.	No.

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1010	Tien Austin		email dated 8/27/19	Food Waste	Composting	<p>My name is Tien Austin and I am writing to provide feedback on the solid waste management system. Having a city or island wide foodwaste program would be significantly beneficial for the community. This program would lower the islands greenhouse gas emissions making us a more sustainable community. This would also lead to a source of organic fertilizer that can be resold to the public or to agriculture. Reducing foodwaste and other organic waste helps us by lessening our effects on the environment, producing fertilizers, and efficient waste management. A program like this one could also be the source of good jobs for local people, helping our economy.</p> <p>Today, the average American trash can is filled with 40% organic waste. This waste ends up in landfills and turn to methane which is 34 times more powerful than CO2. Hawai'i holds a unique spot in the worlds geopolitics. Let us be an example of what sustainability looks like. Many cities are far ahead of us on this issue. in 2009 San Francisco passed an ordinance that makes composting the city's food waste mandatory. Seattle monitors curbside bins and now tags and fines those who violate its composting requirement. Copenhagen, Denmark, has not sent organic waste to landfill in more than 25 years.</p> <p>Investing in an island wide compost program has far more pros than cons, it is clearly a step towards progress.</p>	Thank you for your comment. Please see the response to comment 728.	Yes.
1012	Doora Shin, O'ahu Chapter Coordinator	Surfrider Foundation	email dated 8/27/19	Source Reduction	Pilot Projects	<p>•Can the city fund pilot projects around composting or reduction or reuse or local recycling? This could be a great way to avoid the huge cost of investing in new infrastructure while still achieving your goals.</p>	Thank you for your comment. The City applauds voluntary source reduction efforts taken by restaurants and supports allowing customers to bring their own reusable items in order to reduce the use of single-use items. Ultimately, the State Department of Health would need to change their policies to allow outside containers.	No.
1013	Doora Shin, O'ahu Chapter Coordinator	Surfrider Foundation	email dated 8/27/19	Source Reduction	Incentivize Reuse	<p>•Can the city incentivize reuse businesses/pilot programs such as thrift stores, Reuse Hawaii, etc? This will support the existing ones, and create new ones. You could include a signal to City Council to pass incentives for these kinds of businesses to reduce waste</p>	Thank you for your comment. The City supports incentives for source reduction and hopes to work with other stakeholders as part of the SRWG to determine how best to utilize incentives to achieve maximum reductions.	No.
1014	Doora Shin, O'ahu Chapter Coordinator	Surfrider Foundation	email dated 8/27/19	Composting	All Organics	<p>All other organics should also be included in the intention to divert/compost, as these have the same benefits as above.</p>	Thank you for your comment.	No.
1015	Doora Shin, O'ahu Chapter Coordinator	Surfrider Foundation	email dated 8/27/19	Source Reduction	SRWG	<p>•Please provide more teeth to the SRWG - provide some kind of directive - that City Council and the Mayor's office shall take guidance and directive from the SRWG's recommendations. That funding be provided to test pilot projects.</p>	Thank you for your comment. Please see the response to comment 832.	No.

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1016	Doora Shin, O'ahu Chapter Coordinator	Surfrider Foundation	email dated 8/27/19	Clean Ground Transportation	Refuse Trucks	<p>•All Hawaii Mayors signed an agreement to have 100% clean ground transport by 2045 - please include in the plan a way to help achieve that goal as relevant in waste (trucks to be converted to clean vehicles)</p> <p><u>All Hawaii Mayors signed an agreement to have 100% clean ground transport by 2045. (please see email for link to the site)</u></p>	Thank you for your comment. This may be something to focus on in future ISWMP updates.	No.
1017	Danicole Ramos, Government Affairs Analyst on behalf of Dawn Lippert	Elemental Excelerator	email dated 8/28/19	General	General	I apologize for the delay on submitting comments. Please see our attached comments from our CEO regarding 2019 Solid Waste Management Plan. Feel free to reach out to us for any questions.	Thank you for your comment. Please see the response to comment 964.	No.
1018	Danicole Ramos, Government Affairs Analyst on behalf of Dawn Lippert	Elemental Excelerator	email dated 8/28/19	Source Reduction	Goals	<p>I am submitting testimony in support of the intent of the 2019 Integrated Solid Waste Management Plan with suggested comments.</p> <p>First, I admire the plan's commitment to reduce our solid waste per capita by 25% in 2030. This commitment is in alignment with the Aloha+ Challenge to reduce our State's waste by 70% in 2030. Currently, we are on track to achieve that goal, and the plan's commitment further supports our goals. Moreover, there is a growing market for technologies that help municipalities and corporations integrate waste reduction into their operations. To further strengthen this commitment, the Department of Environmental Services should make a concerted effort to pursue innovative technologies that enhance the development of the circular economy.</p>	Thank you for your comment. The City plans to pursue innovative strategies for waste management through continued dialogue with stakeholders as part of the SRWG. The group will assess the feasibility of new technologies that could assist with this effort.	No.
1019	Danicole Ramos, Government Affairs Analyst on behalf of Dawn Lippert	Elemental Excelerator	email dated 8/28/19	Source Reduction	SRWG	Secondly, I strongly support the development of Source Reduction Working Group. A group of diverse stakeholders in government, business, and non-profits can balance competing interests, while still staying firm in our commitment to diverting waste from the landfill for reuse or recycling. For active engagement, the City must create clear outcomes, timelines, and measurements for the working group to strive for and actively account for their feedback when revising the waste management strategy.	Thank you for your comment. Please see the response to comment 832.	No.
1020	Danicole Ramos, Government Affairs Analyst on behalf of Dawn Lippert	Elemental Excelerator	email dated 8/28/19	Food Waste	Composting	<p>I want to propose the following suggestions to enhance the waste management plan:</p> <p>1. Consider composting: There are policies in place that require large businesses to divert food waste from H-Power in Honolulu, but none for residential communities and small businesses. To address this disparity, the City should consider a standard food waste policy. Cities like <u>San Francisco</u> require food waste to be disposed of in a separate compost bin from the regular trash, which they collect during weekly curbside pick-up. If food waste is not separated, individuals or organizations are fined. By integrating a similar mechanism into our waste management plan, Honolulu can cause a paradigm shift that realizes the benefits of composting such as reduction of GHG emissions.</p>	Thank you for your comment. Please see the response to comment 728.	Yes.

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1021	Danicoles Ramos, Government Affairs Analyst on behalf of Dawn Lippert	Elemental Excelsior	email dated 8/28/19	County Tourist Tax	General	2. Address the environmental footprint tourism contributes: According to a 2017 report by the Hawai'i Tourism Authority, 9.4 million visitors came by air service or by cruise ships to Hawai'i, an increase of 5.3 percent from the previous record of 8.9 million visitors in 2016. Since tourism is a significant part of our State's economy, waste management strategies should address visitor impact. One way to do this is to consider a county fee or other funding mechanism with proceeds dedicated to addressing the environmental footprint of tourism, which includes waste management.	Thank you for your comment. Please see the response to comment 732.	Yes.
1022	Danicoles Ramos, Government Affairs Analyst on behalf of Dawn Lippert	Elemental Excelsior	email dated 8/28/19	Public Education	Coordinator Position	3. Fully commit to educating the public: The plan in its current form includes educating the public about waste reduction and what practices they can integrate into their daily lives to reduce their waste. We see the benefit of this and encourage the City to resource an education specialist for waste reduction. Hiring a full-time education specialist can help transition the public to new waste reduction practices, like composting. One way to allocate funding for an education specialist is to follow Maui County's lead. Maui offers small grants to community partners already doing waste reduction education based on county regulations. Maui's model also demonstrates collaboration among different stakeholders, which is essential to fulfilling our waste management plan. Thank you for the opportunity to testify on the proposed plan. Please reach out to me for any questions. Sincerely, Dawn Lippert	Thank you for your comment. Please see the response to comment 731.	No.
1023	Theodosia Fehsenfeld (Theo)	Zero Waste Schools and Third Eye Sustainability	email dated 8/28/19	General	General	Zero Waste Schools and Founder of Third Eye Sustainability August 28, 2019 Thank you so much for taking the time to write this document, meet with officials, and provide research to enhance the City and County of Honolulu's waste management plan. I hold a degree in Biology with an emphasis in water quality and toxicology, and have job experience doing waste audits, and waste management on Oahu and in Seattle with Cascadia Consulting firm. Two areas of high priority for improvement are the overall tone of the document and the lack of support towards composting and bioconversion markets to divert organics from H-POWER.	Thank you for your comment. Please see the response to comment 793a.	No.

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1024	Theodosia Fehsenfeld (Theo)	Zero Waste Schools and Third Eye Sustainability	email dated 8/28/19	ISWMP Overall	Strengthen Commitments	<p>Comment #1: Use of Passive Voice and Convolution Sentence Structure</p> <p>The use of passive voice and weak verbs decreases the strength and validity of the 2019 ISWMP. This may seem like a minute correction, but revisions of a waste management plan serve to keep the City and County of Honolulu accountable towards specific goals of waste reduction and efficiency in the next ten years. For example, the phrase “investigating the feasibility of designating a Public Education Coordinator” lacks accountability that this measure will be implemented. Furthermore, since this document is created through participation with the general public, the simplification of verbs and use of active voice would help strengthen the City and County of Honolulu’s voice to the general public of Honolulu.</p> <p>Recommendation #1: Active Voice and Simplification of Sentence Structure</p> <p>The phrase “investigating the feasibility of designating” could be exchanged with “hiring” a Public Education Coordinator as the final goal for the Environmental Services Division. Smaller goals including researching feasibility should be included, however without that finite goal that the Environmental Services Division is striving to meet, there is a lack of accountability or direction forward.</p>	Thank you for your comment. The City has made a number of changes to the Plan as a result of input received during the public comment period, including strengthening the language to make hiring a public education coordinator a priority.	No.

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1025	Theodosia Fehsenfeld (Theo)	Zero Waste Schools and Third Eye Sustainability	email dated 8/28/19	Food Waste	Composting	<p>Comment #2: Lack of Diversion of Organic Waste from H-POWER</p> <p>The 2019 ISWMP shows a 4% increase in organic waste production between 2006 and 2017 with organics comprising 29.3% of waste going to H-Power. This presents a massive opportunity to divert food waste from H-Power to create a marketable product and revenue through the creation of neighborhood wide composting programs. Currently on Oahu, there are no nutrient-rich compost sources for local farmers and gardeners which directly affects the production of local food on Oahu. Heather Mohr, founder of Keiki and Plow, a local organic farm in Hawaii Kai, says that compost sold by Hawaiian Earth Products lacks fecundity and does not help her plants grow well. Other composting sources are packaged and shipped from the mainland. Without supporting local farmers on the island, we will continue to rely on off-island sources which contribute to more greenhouse gases in the long-run. Furthermore, this demonstrates our economic reliability on food sources from the mainland which could be reduced if Oahu is hit by a devastating hurricane. Furthermore, with diversion of food waste to local composting programs, this will free up more space for predicted increased loads to H-POWER in the next decade. I support the City's home composting workshops, but many residents do not have the capability to compost particularly if they live in an apartment complex. Additionally, there is a Dept. of Health law that deters local composting business because it states that you are not allowed to transport food without a refrigerated vehicle. This is deterring a lot of composting operations to get up and running because of that initial hurdle of getting a refrigerated vehicle.</p> <p>Recommendation #2:</p> <p>To help support bioconversion of food waste into compost and nutrient rich soil sources, the plan should include ways to bolster this opportunity for "economic security" and "reduce the amount of waste sent to the landfill and incinerator," directly quoted from the 2019 ISWMP. This will help the City and County achieve their primary goal for recycling and bioconversion and help "achieve additional value from materials that have already been used." Some ways to bolster local composting programs would be to give out grants to local businesses and non-profits and to change Dept of Health laws around composting or work with small businesses on how they can work with current legislation.</p>	Thank you for your comment. Please see the response to comment 728.	Yes.
1026	Linda Luli Nakasone Oamilda, Legislative Analyst, on behalf of Councilmember Carol Fukunaga	Office of Councilmember Carol Fukunaga	email dated 8/29/19	General	General	<p>Thank you for the opportunity to provide comments on the City and County of Honolulu's 2019 Integrated Solid Waste Master Plan Public Comment Draft. It provides a welcome overview of the city's current solid waste management operations, as well as health/safety, environmental and financial sustainability requirements.</p>	Thank you very much for your comments regarding the ISWMP and your patience as we work through the review process!	No.

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1027	Linda Luli Nakasone Oamilda, Legislative Analyst, on behalf of Councilmember Carol Fukunaga	Office of Councilmember Carol Fukunaga	email dated 8/29/19	Sewage Sludge	Disposal Options	<p>However, the Draft ISWMP does not provide a meaningful discussion of waste disposal alternatives that could improve H-POWER's long-term viability and help to accelerate the city's CO2 reduction goals.</p> <p>For example, Section 5.1 — Special Wastes: Goals and Objectives states: The goal of this section is to assess how special wastes are being managed, evaluate if these management techniques are adequate, and identify strategies to improve the management of special wastes where necessary. Examples of options the City may investigate that have the potential to divert special wastes from landfill disposal include sending agricultural waste to HPOWER and diverting treated medical sharps from the landfill.</p> <p>However, alternatives to the current method of disposal of sewage sludge (Section 5.3.6) are barely touched upon: "In the future, the City has long-term plans to convert all WIA/TP sludge to biosolids for use as fertilizer as the first management option. H-POWER would serve as a backup in the event that conversion facilities are unable to process the sludge, with disposal at WGS as a third option only if those first two options are unavailable."¹⁷⁹</p> <p>The City's Department of Environmental Services plans to upgrade the Honouliuli ViMftP to install an anaerobic system to process sludge. H-POWER will eventually (within the next 5 years) become the backup option for sludge." (ISWMP Public Comment Draft, page 83).</p>	Thank you for your comment. Although the plan is primarily put together by Refuse to address solid waste, based on your comments, we got together with Wastewater to see what else ENV as a whole might be doing with sewage sludge. Currently, ENV is looking into the feasibility of using sewage sludge for production of methane to be used for generation of electricity. Not only is sewage sludge being considered, but also food waste, which the recent waste composition study reported is the number one component of waste going to H-POWER.	No.
1028	Linda Luli Nakasone Oamilda, Legislative Analyst, on behalf of Councilmember Carol Fukunaga	Office of Councilmember Carol Fukunaga	email dated 8/29/19	Sewage Sludge	Disposal Options	In FY 2017, the sludge receiving station at H-POWER diverted and combusted approximately 14,430 tons of sludge (ISWMP Public Comment Draft, page 82). That sewage sludge became part of the 141,000 tons of combustion ash generated by combustion of solid waste at the facility in FY 2017. The combustion ash subsequently poses additional community challenges for which special handling in an ash monofill at the WGS is required.	Thank you for your comment. Please see the response to comment 1027.	No.
1029	Linda Luli Nakasone Oamilda, Legislative Analyst, on behalf of Councilmember Carol Fukunaga	Office of Councilmember Carol Fukunaga	email dated 8/29/19	Sewage Sludge	Disposal Options	<p>I have the following questions regarding the Public Review Draft:</p> <p>1. Has Dept. of Environmental Services evaluated alternative uses of sewage sludge besides combustion at H-POWER? What about uses other than conversion into fertilizer? For example, the City of Fukuoka has partnered with Toyota to convert sewage sludge into hydrogen fuel for use by the automaker's Mirai electric vehicle as well as those made by other brands. The Fukuoka wastewater treatment plant currently produces 300 kilograms of hydrogen per day, which is enough to fuel 65 Mirai vehicles, according to Toyota's chief Mirai engineer. If all the biogas produced by the plant were converted to hydrogen, that number would jump to 600 cars per day.</p>	Thank you for your comment. Please see the response to comment 1027.	No.

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1030	Linda Luli Nakasone Oamilda, Legislative Analyst, on behalf of Councilmember Carol Fukunaga	Office of Councilmember Carol Fukunaga	email dated 8/29/19	H-POWER	Emissions From H-POWER	2. What is the amount of carbon dioxide emissions generated through H-POWER's operations (e.g., assuming a typical operation)? What is the total number of days of downtime for HPOWER operations that were reflected in Scenario 1 (ISWMP, Section 10.3 — Energy Estimates, page 152)?	Thank you for your questions. In calendar year 2018, H-POWER produced 769,460 tons CO ₂ e. By comparison, per the DOH Clean Air Branch website 2015 report, AES Hawaii, Inc., which is the coal burning facility next door to H-POWER, produced 1.64 MM tons CO ₂ in 2015. After unit conversion, that's 698,042 metric tons CO ₂ from H-POWER to 1,640,000 metric tons CO ₂ from AES. Also for comparison, AES produces approximately 180 MW of electricity versus 68.5 MW of electricity from H-POWER according to HECO's website. Please also keep in mind that H-POWER burns trash that would otherwise go to landfill and produce CO ₂ equivalent emissions by decomposition anyway.	No.
1031	Linda Luli Nakasone Oamilda, Legislative Analyst, on behalf of Councilmember Carol Fukunaga	Office of Councilmember Carol Fukunaga	email dated 8/29/19	Sewage Sludge	Biosolids	3. What is the projected demand for conversion of all WWTP sludge to biosolids for use as fertilizer? (NOTE: Under such a scenario, H-POWER would serve as a backup if conversion facilities could not process the sludge.) During 2017-2018 Council committee meetings on recycling and composting measures, numerous questions were raised about use of sewage sludge-processed biosolid pellets. Although Department of Health has approved their use as a general all-purpose fertilizer, committee members raised odor and sanitation quality concerns about the use of the biosolid pellets at city-owned parks and recreational areas.	Thank you for your comment. These are all issues being explored by the Wastewater Systems Division.	No.

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1032	Linda Luli Nakasone Oamilda, Legislative Analyst, on behalf of Councilmember Carol Fukunaga	Office of Councilmember Carol Fukunaga	email dated 8/29/19	ISWMP Update Process	Public Engagement	I also believe that additional public discussion and review would have produced a more comprehensive and dynamic Integrated Solid Waste Management Plan. While the ISWMP Public Comment Draft has met the statutory requirements for the City and County of Honolulu's adoption of the 2019 plan, I believe that one public hearing at Kapolei Hale on July 31, 2019 was insufficient to encourage a broad range of future-oriented waste management strategies for the City & County of Honolulu's environmental services operations. I look forward to additional discussions regarding the ISWMP Public Comment Draft as it nears adoption.	Thank you for your comment. In response, we would like to emphasize that there was a lengthy review process that led the plan to where it is now. •An advisory committee (AC) of 13 members from the solid waste industry, regulators, and environmental groups was formed to review the ISWMP •Seven AC meetings were held over the course of roughly a year with draft sections provided prior to the meetings. At the meetings, draft sections were presented and AC comments were received. There were also a number of other members of the public representing non-governmental organizations like Surf Rider Foundation present at the meetings to provide feedback on the document. •The City received AC input on each section prior to preparing the first complete draft plan, and AC member comments resulted in many changes incorporated into that draft •The City received AC input on that first complete draft plan and made many changes based on that input before the public draft plan was issued If you have any further questions or comments on the plan, we are happy to entertain them and would be willing to meet and discuss. We would also look forward to any discussion on what City Council may be willing support and to help us push forward with legislation.	No.
1011a	Doora Shin, O'ahu Chapter Coordinator	Surfrider Foundation	email dated 8/27/19	Climate Change	Action Needed	My comments on the ISWMP below: •Please share bolder language and content to be able to address and be part of the solution to the climate crisis. Scientists give us 11-12 years to solve this, and this is a 10 year plan, so this is our chance	Thank you for your comment. Please see the response to comment 793a.	No.
1011b	Doora Shin, O'ahu Chapter Coordinator	Surfrider Foundation	email dated 8/27/19	Food Waste	Composting	•You can do this by including the intention to have residential and commercial food waste diverted / composted which will help local farmers, build better soil, and be a fantastic method of sequestering carbon	Thank you for your comment. Please see the response to comment 728.	Yes.
753a	Raechel Kadler		email dated 8/18/19, 2019 Draft ISWMP	Recycling	Sorting	In addition to the green bin program, Vancouver requires residents to sort their recyclables for pickup. I believe this could help with the issues of sorting recyclables for off-island shipments to recycling facilities and denial in taking items due to poor sorting.	Thank you for your comment. Please see the response to comment 946.	No.

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753b	Raechel Kadler		email dated 8/18/19, 2019 Draft ISWMP	Source Reduction	Single Use Plastics	In addition to requiring residents to sort their recyclables, we should also regulate the number of single use "recyclable" products that are coming into the islands. Creating taxes for industries that bring in these items (ex. the small shampoo/soap bottles from the hotel industry) could encourage these places to minimize their purchases and hopefully reduce the number of items entering our waste stream. The money from these taxes could be used for the Green Bin programs, or pay for the shipment of recyclables to off-island facilities (or other waste reduction programs).	Thank you for your comment. The City has identified single-use material bans (beyond the plastic bag ban already in place) as an initiative for further consideration by the SRWG.	No.
763a	Taylor Eastburn	Patagonia Honolulu EPP	email dated 8/19/19, 2019 Draft ISWMP	H-POWER	Waste Diversion	Is H-POWER really our best option? With ridiculous minimums and potential environmental issues with the emissions and leftover ash, I think we can do better. - H-POWER: We do not want a fourth boiler, so let's not plan for it! Instead, let's plan to make less trash and renegotiate the H-POWER so we do not have to deliver 800,000 tons of trash each year.	Thank you for your comment. Please see the response to comment 733.	No.
763b	Taylor Eastburn	Patagonia Honolulu EPP	email dated 8/19/19, 2019 Draft ISWMP	Beneficial Reuse of Ash	Health and Safety	- H-POWER ash: before committing to the "beneficial reuse of ash" demonstrate that this material safe to use (i.e. what happens to the heavy metals, dioxins, PCBs that infuse the ash?).	Thank you for your comment. Please see the response to comment 734.	No.
793a	Audrey Stanley		email dated 8/20/19, 2019 Draft ISWMP	Climate Change	Emissions From H-POWER	To whom it may concern, I am born and raised in Hawaii, and my family lives on Oahu. We all see sea level waters rising around Oahu as a result of climate change. I am very concerned as a homeowner to see Hawaii's beaches disappearing, summers becoming hotter, and more fires. I hope the county is doing its part by implementing an aggressive plan to reduce emissions being let off by burning almost a million tons of garbage a year. We should not be burning so much garbage. I feel a strong obligation to protect our land. The plan presented feels outdated, and needs major edits to catch up to what we should be doing. Status quo is not enough. Delaying another 10 years is not acceptable. We need to be at the forefront of environmental policies and plans that protect the environment for years and generations to come, instead of destroying it. Protecting the environment is worth whatever economic cost.	Thank you for your comment. The City has made a number of changes to the Plan as a result of input received during the public comment period and looks forward to the opportunity to continue to work with key stakeholders on innovative waste solutions as part of the SRWG. The Plan reflects the constraints of the funding available to the Department of Environmental Services to enable and expand strategies that may help reduce further greenhouse gas emissions that contribute to climate change. An analysis is being done to report on greenhouse gas emissions at H-POWER. Additional work may stem from the report.	No.
793b	Audrey Stanley		email dated 8/20/19, 2019 Draft ISWMP	Source Reduction	Single Use Plastics	1. Add language to support legislation change: Instead of saying the goal is 1% reduction in plastics, please change it to say "Our goal is a 90% reduction in plastics, however, this would only be possible with legislation to support single use plastic ban or other similar initiatives to make this possible. In the meantime, 1% is the only perceivable goal without legislative support." This language will help showcase desire and need for change, without compromising your desire for realistic goals based on current conditions. Also, can't we reduce plastics by more than 1%? 1% is so low. Can't we make it 2%?	Thank you for your comment. While the Refuse Division is not able to ban single-use materials at Honolulu International Airport, this would be a good topic to investigate further with the SRWG.	No.

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797a	Casey Nakamura		email dated 8/21/19, 2019 Draft ISWMP	Public Education	Increase Awareness	Dear City and County of Honolulu, My name is Casey Nakamura, I am a resident of Hawaii born and raised on the Big Island, but I was living on O'ahu for the last 8 years. Environmental protection is a huge passion of mine and I would like to see our state continue to make the best efforts to combat global warming. I do not believe we are doing enough to combat the amount of solid waste created by residents and visitors of Hawai'i. As an adult (and a child growing up on the islands) I do not think we have enough public awareness to real solutions to this issue. In Section 7, I would like to see extensive information (or further access to it) be provided for all those incoming people to the islands, as well as at every level of education. Not just "reduce reuse recycle", but impactful statistics on environmental harm of waste as well as the most significant and readily available sources of reduction. All available solutions and resources should be broadcast publicly through television commercials, radio ads, and throughout local communities.	Thank you for your comment. Please see the response to comment 784.	No.
797b	Casey Nakamura		email dated 8/21/19, 2019 Draft ISWMP	County Tourist Tax	\$1	I support implementing a small fee (ie. \$1.00) per visitor to Hawai'i, in order to aid all waste management efforts. This not only helps the state to subsidize costs, but brings about more awareness as visitors will feel more inclined to look into how their money is being used.	Thank you for your comment. Please see the response to comment 732.	Yes.
810a	Asia Yeary		email dated 8/26/19, 2019 Draft ISWMP	Public Education	Coordinator Position	To make waste reduction a reality, the City and County needs resources, including: • A full-time Education Specialist to focus on waste reduction. Please hire one.	Thank you for your comment. Please see the response to comment 731.	No.
810b	Asia Yeary		email dated 8/26/19, 2019 Draft ISWMP	County Tourist Tax	\$1	• Funding. If a \$1 fee is applied to each visitor to subsidize the burden of dealing with visitor industry waste, then the City and County could use these funds to help Honolulu with waste reduction programs.	Thank you for your comment. Please see the response to comment 732.	Yes.
815a	Asia Yeary		email dated 8/26/19, 2019 Draft ISWMP	Glass	Local Options	Glass: Consider local glass reuse and washing along with the more intensive glass crushing. Thank you. I look forward to reviewing the revised ISWMP.	Thank you for your comment. Please see the response to comment 735.	No.
815b	Asia Yeary		email dated 8/26/19, 2019 Draft ISWMP	General	Offer of Further Support	If you would like to meet with SF Environment Zero Waste Team or SFO's Sustainability Team, please let me know.	Thank you for your comment. The City will keep this generous offer in mind moving forward.	No.
819a	Katharina Anhalt, MBA Sustainability Management		email dated 8/26/19, 2019 Draft ISWMP	Biogas	Composting	Thank you for the opportunity to submit comments. Please kindly consider my input for the next 10-year waste management plan. Organic waste: Currently, green waste is already being composted into soil at Hawaiian Earth Products facilities. This is a great start and should be continuously improved by: Capturing and using the methane that gets released as a byproduct of the composting process: As methane (CH ₄) has an atmosphere warming effect that is multiple times as severe as carbon dioxide (CO ₂), more effort should be made to avoid uncontrolled venting into the atmosphere. Therefore, composting facilities should capture the methane. It could be used on site in a biogas plant to create electricity or (at locations where feasible) fed into the City and Counties natural gas grid.	Thank you for your comment. Methane forms from decomposition of organic waste in the absence of oxygen (anaerobic conditions). Composting utilizes aerobic decomposition (using oxygen) and is one method of reducing the emissions of greenhouse gases. With appropriate operation, decomposition using composting breaks down organic waste in an aerobic process (with oxygen) which results in producing carbon dioxide instead of methane.	No.

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819b	Katharina Anhalt, MBA Sustainability Management		email dated 8/26/19, 2019 Draft ISWMP	Food Waste	Residential Collection	2. Explicitly include household food waste in green waste collection: Currently, the green bin pick up focuses on garden clippings, while a large portion of residents use the black bin for daily household food waste. This is counterproductive, as (usually rather wet) food waste requires much fuel to be burned in the waste incinerator and the potential to use the food waste for biogas and compost is being wasted. In order to execute this, a more frequent pick up of organic material might be necessary, to avoid residents being bothered by smell and insects. Also, a separate collection of food waste in special, smaller containers could be implemented, as food waste has a high energy potential and is very lucrative, if turned into biogas.	Thank you for your comment. Please see the response to comment 728.	Yes.
835a	Severine Busquet		email dated 8/27/19, 2019 Draft ISWMP	County Tourist Tax	\$1	One way to support the important work of the island waste management team is to create a county tourist tax of \$1.00 per visitor. Tourism has a massive impact on our local waste systems. Actions should be taken to support the visitor industry in prioritizing waste reduction.	Thank you for your comment. Please see the response to comment 732.	Yes.
835b	Severine Busquet		email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	Residential User Fees	I would also support Residential User Fees mentioned in section 3.4.3 especially weight-based fees providing greater financial incentives to reduce our amount of waste.	Thank you for your comment. The City supports source reduction and has included a number of strategies for reducing waste in the Plan.	No.
836a	Severine Busquet		email dated 8/27/19, 2019 Draft ISWMP	H-POWER	Waste Diversion	I also have comments regarding H-POWER. My first comment is relative to the mention in section 1.10.3 of renewable electric energy when talking about electricity produced by H-POWER. I do not understand how trash can be considered as a renewable resource. It is especially confusing to residents that need to understand that burning waste is not a clean renewable way to manage our waste and that reducing the source is the key solution. For these reasons, I do not want a fourth boiler at H-POWER. Instead, let's plan to make less trash and renegotiate the H-POWER deal so we do not have to deliver 800,000 tons of trash each year.	Thank you for your comment. Please see the response to comment 942.	No.
836b	Severine Busquet		email dated 8/27/19, 2019 Draft ISWMP	Beneficial Reuse of Ash	Health and Safety	Finally, before committing to the "beneficial reuse of ash", it should be demonstrated that H-POWER ash is safe to use (what is the ash content in heavy metals, dioxins, ... ?).	Thank you for your comment. Please see the response to comment 734.	No.
838a	Christian Palmer		email dated 8/27/19, 2019 Draft ISWMP	Food Waste	Composting	I recently looked over the new Integrated Solid Waste Plan and wanted to make a few comments. While the general plan is good, it is not very progressive or innovative. Given the current ecological crises we need to think more creatively about our environmental impact. •The plan doesn't really address food waste or composting in any meaningful way.	Thank you for your comment. Please see the response to comment 728.	Yes.
838b	Christian Palmer		email dated 8/27/19, 2019 Draft ISWMP	Public Education	Coordinator Position	•The education component is really underdeveloped. There needs to be a full time education specialist in order to implement a substantial education program.	Thank you for your comment. Please see the response to comment 731.	No.
838c	Christian Palmer		email dated 8/27/19, 2019 Draft ISWMP	H-POWER	Waste Diversion	•There should be no consideration of burning recyclables. We need to develop a system that can deal with global variations in prices.	Thank you for your comment. Please see the response to comment 733.	No.

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863a	Harith Jayaweera		email dated 8/27/19, 2019 Draft ISWMP	Food Waste	Composting	Aloha, I am a homeowner living in Makiki and wanted to send in my testimony regarding the Honolulu Integrated Solid Waste Management Plan. •A food waste composting aspect is lacking in this plan. Introducing composting could not only reduce our emissions but also act as a carbon sink	Thank you for your comment. Please see the response to comment 728.	Yes.
863b	Harith Jayaweera		email dated 8/27/19, 2019 Draft ISWMP	Public Education	Increase	•This plan is missing waste reduction education. I believe this is the first proactive step in curbing the waste cycle	Thank you for your comment. Please see the response to comment 784.	No.
863c	Harith Jayaweera		email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	BYO Take-Out Containers	•Working with the Department of Health to implement ways that reuse containers, and therefore reduce our overall waste production. Thank you for your time to listen to my thoughts and I sincerely hope this plan can become something that will be groundbreaking in keeping Oahu clean and safe in the future. Mahalo, Harith Jayaweera	Thank you for your comment. Please see the response to comment 726.	No.
864a	Anete Jayaweera		email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	Strategies	I support the Zero Waste movement. I would like to see this policy use stronger verbiage to result in enforceable actions. As a resident that positively contributes to the local society, as a law abiding tax payer and as a local homeowner that cares about my community, I would like to express my concerns about the current policy in hopes to provide a better, cleaner, healthier and happier future for generations to come that will reside in this paradise. Having been born in Eastern Europe, very close to Russia, right around the Soviet Union times, life as we knew it was very dreary, simple and frugal. I remember growing our own vegetables, even right there in the city. I remember reusing and repurposing things, so that new items wouldn't need to be purchased. I remember having barely any rubbish to dispose of at the end of the week, as we repurposed or composted as much as possible. It was a way of life – taught from an early age, by grandparents, as well as by government - in middle school. Our current and daunting waste issue is an obvious side-effect of manufacturing unnecessary goods. By enforcing policies that limit single use plastics, allow for local composting, and sanitizing stations in order to hygienically use reusable containers at restaurants, the taxpayers will not be burdened with the bill to operate HPower to recycle the single use plastics and clean the oceans, streets, drains of loose rubbish.	Thank you for your comment. Please see the responses to comments 728 and 986.	Yes.
864b	Anete Jayaweera		email dated 8/27/19, 2019 Draft ISWMP	County Tourist Tax	General	Perhaps, we can start with a minimal fee that can be charged to the tourist population on Oahu, which would take care of some of the costs to manage the waste from their temporary stays on island.	Thank you for your comment. Please see the response to comment 732.	Yes.

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874a	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Climate Change	Increase Efforts	Below is an overview of high-level impressions from the final plan draft, followed by specific feedback corresponding to relevant sections and subsections. The high-level feedback is highlighted according to priority and the positive impact we believe suggested measures will have for the County as it pursues ambitious waste reduction and resource recovery prior disposal. Though the plan draft is detailed and comprehensive, we believe that the county has not only an opportunity but an urgent imperative to increase the ambition of this plan with more firm, stated commitment to innovative, on-island solutions and bold policy support. The best scientists in the world are in agreement that we have less than 12 years to take serious action across all sectors, including waste reduction and management, before our climate systems move beyond repair. With ten years in this plan to work with, we could work toward dramatic positive change required by the climate crisis we face.	Thank you for your comment. Please see the response to comment 793a.	No.
874b	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Waste Reduction	Goals	What we like - with some caveats: 1) Commitment to reducing solid waste per capita by 25% by 2030 (let's try for 100%). The commitment to a firm target is greatly appreciated. We ask that the City consider an even more ambitious goal or an increasing percentage target as we reach and then exceed these goals over the next ten years.	Thank you for your comment. While the City is comfortable with a reduction goal of 25%, we will not stop there and hope that the strategies identified through this Plan and future discussion with the SRWG will result in reductions in exceedance of the goal.	No.
874c	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	Single Use Plastics	2) Reducing the presence of plastics in the MSW by 1% to reduce GHG emissions from H-POWER (by weight). This is a significant and appreciated commitment. We believe, through the many strategies available, that we can make this a much more ambitious target. Please consider increasing this target to 10%, with an increasing target of 25% by 2030.	Thank you for your comment. Please see the response to comment 781.	No.
874d	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Source Reduction	SRWG	3) The creation of the Source Reduction Working Group The formation of this group was a direct result of the City and Jacobs responding to community feedback, and it is a significant, and appreciated step. We ask that further details be addressed, however, on how the Group's conclusions and recommendations will be incorporated into our waste management strategy? What are the outcomes, timelines, etc. What assurances or commitments can be offered that assure group members that their recommendations will be due consideration and weight by decision makers?	Thank you for your comment. Please see the response to comment 832.	No.
901a	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Glass	Local Options	4.3.8 Glass Reference is made in this section to RFPs for glass crushing, and its consideration as beneficial reuse. On the continent, and globally, bottle collection and sanitation programs are on the rise with demonstrated feasibility. If the county is specifically investigating glass crushing, then the feasibility of bottle sanitation and rebottling infrastructure should also be referenced and considered for investigation and bid solicitation, especially if county and state goals call for on-island reuse and waste reduction initiatives.	Thank you for your comment. Please see the response to comment 735.	No.

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901b	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Glass	ADF	4.3.8 Glass Efforts have been made in the past to urge the state to raise the ADF for non-deposit glass. Please include here, as in section 4.4.7.2, if the county is willing to advocate for an ADF increase in the future in order to facilitate the collection of more glass, especially if crushing programs move forward.	Thank you for your comment. The Plan text will be updated as recommended.	Yes. Revised Sections 4.3.8, 4.4.7.2, 4.5 (new ongoing initiative), and 12.3 (new ongoing initiative).
908a	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Public Education	Coordinator Position	4.4.3 Enhance Education on Recycling Programs Regarding this sentence "Inadequate funding limits the number and types of programs that can be provided, as well as their effectiveness." Recommendation is to add an additional sentence indicating that the allocation of funds for a dedicated education specialist is a top priority in order to support proper education programs	Thank you for your comment. The Plan text will be revised as recommended.	Yes. Revised Section 4.4.3 as recommended.
908b	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	H-POWER	Waste Diversion	General comment: As mentioned in previous meetings and submitted comments, the presence of sections in this chapter discussing the need for incinerating recyclables adjacent to sections describing the need for education to increase recycling and lower contamination sends a highly conflicting message about the City's priorities. We need to state our objections, again, to such blatant promotion of recyclables incineration as the preferred strategy to address the current global recycling crisis instead of ambitious planning to reduce the generation of recyclables through strategies mentioned above. Burning is short-term planning, but this 10 year plan calls for long-term strategy.	Thank you for your comment. Please see the response to comment 906.	No.
912a	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Special Wastes	Batteries	Section 5: Special Wastes Section 5.2.1 Legislative Recommended Addition: Some in the renewable energy sector have indicated that, in the near future, a large volume of battery storage components will begin to be decommissioned, but they are not legally allowed to be transported off-island to processing centers since they are considered hazardous, requiring on-island processing. If this is, in fact, the case then the County may want to consider seeking an amendment to HRS to include this type of technology under Special Wastes and plan for their local processing and disposal in this document.	Thank you for your comment. To date, the City has not encountered this issue and it refers rechargeable battery issues to suppliers or manufacturers. We are keeping a close eye on the waste stream to see if these batteries start to show up in larger quantities and will make adjustments to our contracts and public education as needed.	No.
912b	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	Special Wastes	Sulfurous Material?	Section 5: Special Wastes Section 5.2.1 Legislative Comment: In previous AC meetings, the surplus of sulfurous materials being turned away from the landfills was brought up as a potential problem for the C&C to address. Will this be included in the final draft of this list of targeted materials?	Thank you for your comment. These materials rarely appear at the landfill. The City addresses them on a case by case basis.	No.

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918a	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	HHW	Public Education	<p>6. HHW & Electronic Waste</p> <p>6.2.2.3 Monitor Quantities Collected and Costs Associated with HHW Collection Program “The City continues to evaluate the HHW collection program to ensure that it meets the needs of residents on Oahu. Factors considered in optimizing the program include the following: • Are there more residents who call for appointments than the 200 homeowners the contractor is required to handle during each collection event? • Is the volume of HHW being collected increasing or decreasing at each event and over time? Is the current system the most cost-effective system?”</p> <p>Recommended additional bullet or amendment to existing bullets above: <u>Evaluate advertisement and promotion strategies to determine if they are effectively reaching the maximum number of residents possible.</u></p> <p>Kōkua Hawai'i Foundation hosts 18 recycling drives a year, and we frequently hear from attendees that they don't know what to do with their HHW, so we believe that messaging and outreach could be improved and is worth noting in the 10 year plan.</p>	Thank you for your comment. The Plan text will be updated as recommended.	Yes. Revised Section 6.2.2.3 to include additional bullet.
918b	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	HHW	Funding	<p>6. HHW & Electronic Waste</p> <p>Recommended Additional Content: Re: program funding, this section could highlight the potential for EPR or Advanced Disposal Fee approaches for HHW, in order to ensure adequate funding (expansion even?)</p>	Thank you for your comment. This topic is covered in Section 6.3.3.1.	No.
921a	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	E-Waste	Existing Programs	<p>6.3.2 Existing Programs</p> <p>The City provides residential and commercial generators of e-waste with detailed information on reuse, recycling, and proper disposal of e-waste (are there links to this information cited? Further details?). Commercial generators are banned from disposing of e-waste on Oahu and must work with the DOH to find an alternative (Can this sentence elaborate on what those alternatives may be?). Residents are allowed to dispose of e-waste with residential MSW or during bulky item collection, but are encouraged to take advantage of recycling options (There is no information, links to, or details provided on what these “recycling options” are. Please include additional information here. More is needed beyond the one link in Section 6.3.2.1). E-waste management will become increasingly important as the amount generated increases over time. Additional information regarding available recycling programs is provided in the following sections.</p> <p>Please flesh out this and the related sections. This feels like a lost opportunity to discuss current and aspirational planning for a resource that is abundant on-island and quickly increasing.</p>	Thank you for your comment. The Plan will be updated to include additional detail and links.	Yes. Additional detail and links added to Sections 6.3.2, 6.3.2.1, and 6.3.2.2.

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921b	Natalie McKinney, Executive Director	Kōkua Hawai'i Foundation	email dated 8/27/19, 2019 Draft ISWMP	E-Waste	Reuse and Repair Centers	6.3.2 Existing Programs ☐ Recommended Additional Content: Please add mention in this section the potential for creating repair centers and workshops to encourage the reuse of electronics and engagement of citizens in support of source reduction.	Thank you for your comment. The City plans to work with the SRWG to assess the feasibility of repair centers and workshops.	No.